UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 08 1995

Mr. Paul Newcomb Bio-Lab, Inc. P. O. Box 1489 Decatur, CA 30031

Dear Mr. Newcomb:

Subject: Synergy Tabs

EPA Registration No. 5185-435

Your Amendment Dated September 29, 1994

This is in response to your amendment of updated label and two Confidential Statements of Formula (basic and an alternate formulation citing additional sources for the active ingredient, trichloro-s-triazinetrione.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable subject to the following comments.

- 1. In the ingredient statement delete the line "Total Active Ingredients: 96.6".
- 2. Include the following referral statement on the front panel: See back panel for additional precautionary statements.

A stamped copy is enclosed for your records. Submit five copies of the final printed label.

The two Confidential Statements of Formula dated September 30, 1994 (basic and an alternate formulation of additional sources for the active ingredient are acceptable.

BEST COPY AVAILABLE CONCURRENCES SYMBOL SURNAME DATE OFFICIAL FILE COPY

EPA Form 1320-1A (1/90)

)

Printed on Recycled Paper

☆ U.S. GOVERNMENT PRINTING OFFICE 1995 - 619-45

If you have any questions, please call Marianne Clark at (703) 305-7879.

Sincerely yours,

(D)

Ruth Douglas Product Manager (32) Antimicrobial Program Branch Registration Division (7505C)

SYNERGY TABS

ALGICIDE--SANITIZER--BACTERICIDE--FUNGICIDE
EXCLUSIVELY DESIGNED FOR USE WITH THE SYNERGY SYSTEM
SPECIFICALLY FORMULATED FOR USE IN AUTOMATIC AND FLOATING TYPE
CHLORINATORS

CONTAINS ATC-3 EROSION CONTROL AGENT INCREASED SANITIZER EFFICIENCY ENHANCED SWIMMER COMFORT PATENTED TECHNOLOGY

ACTIVE INGREDIENT:

TRICHLORO-S-TRIAZINETRIONE 91.5
DISODIUM BIBORATE PENTAHYDRATE 5.0
TOTAL ACTIVE INGREDIENTS: 96.5
INERT INGREDIENTS: 3.5
TOTAL 100.0

KEEP OUT OF REACH OF CHILDREN DANGER

Immediately flush with cold water for at least 15 minutes. Then get immediate medical attention. IF CONTACT WITH SKIN: Brush off excess chemical and flush skin with cold water for at least 15 minutes. If irritation persists, get medical attention. If INHALED: Remove to fresh air. If breathing is difficult, have trained person administer oxygen. If not breathing, give artificial respiration. Call a physician immediately. IF SWALLOWED: Drink large amounts of water. DO NOT induce vomiting. Avoid alcohol. Never give anything by mouth to an unconscious person. Call a physician or poison control center immediately. NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. IN CASE OF MEDICAL EMERGENCY, CALL 1-303-623-5716.

MANUFACTURED BY:

EPA REG. NO. 5185-435

BIOLAB, INC. DECATUR, GA

`)

₱PA EST. NO. 5185-GA-1

NET WEIGHT

ACCEPTED with COMMENTS in EPA Letter Dated:

JUN 08 1995

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 5

5185-435

<u>ک</u>

This product is specifically formulated for use in automatic type feeders. It provides highly effective pool water sanitization and algae control when used in this manner. This combination of ingredients enhances the water quality to reduce potential eye and skin irritation. This product is formulated to dissolve more cleanly and uniformly in automatic feeders thereby reducing plugging, fouling, maintenance requirements and adjustments.

DIRECTIONS FOR USE:

)

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

Prior to using this product, the filter system should be properly cleaned and backwashed and the pool water pH adjusted to 7.2-7.6. It is recommended that the pool be superchlorinated to establish a chlorine residual of 1.0-3.0 ppm of free chlorine.

INITIAL APPLICATION: This product is specially designed for use in automatic type feeders except for bromine only type feeders (See Caution below). Turn the pump off before opening the feeder housing. Stand to the side of the feeder and carefully remove the feeder lid allowing any pressure that may have built up to bleed off. Inspect the resevoir and clean thoroughly if any build-up of greasy deposits, dirt or any other debris are present in the feeder. Prior to adding this product to the feeder, refer to the operating instructions provided by the manufacturer of the unit. Fill the feeder according to the operating instructions and reclose making sure the feeder lid is securely tightened. Turn on the pump to check the system for proper sealing. Adjust the feeder control rate according to the manufacturers instructions to provide a constant treatment level of 1-3 ppm sanitizer in the pool water. Proper feed rate is determined by regular testing with a SYNERGY test kit.

ROUTINE MAINTAINENCE: Test pool water regularly (at least weekly) and check feeder weekly, refilling as needed. Pools should be shocked routinely to maintain optimum water quality. Add additional product as needed to maintain a free sanitizer level of 1-3 ppm in the pool water. Regular use of a SYNERGY test kit is recommended to make certain adequate levels of sanitizer and proper pH are being maintained in the pool water.

CAUTION: Do not use this product in automatic brominators or skimmers. One of this product through a bromine type feeder or skimmer could cause an adverse chemical reaction or explosion resulting in serious bodily injury, of death or property damage.

Reentry into treated swimming pools is prohibited above levels of 3 ppm chlorine.

STORAGE AND DISPOSAL Keep this product dry in original tightly closed container when not in use. Store in a cool, dry, well ventilated area away from heat or open flame. Moisture may decompose this product and cause a violent reaction leading to fire and explosion. In case of decomposition, isolate container if possible and flood area with large amounts of water to dissolve all material before discarding this container. Do not contaminate food or feed by storage or disposal. CONTAINER DISPOSAL: Do not reuse container, but place in trash collection. Rinse thoroughly before discarding in trash.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER: Highly corrosive. Causes skin and eye damage. May be fatal if swallowed. Do not get in eyes, on skin or on clothing. Wear goggles or safety glasses and rubber gloves when handling this product. Irritating to nose and throat. Avoid breathing dust and fumes. Remove and wash contaminated clothing before reuse. For skin or eye contact, or if dust/fumes are inhaled, immediately follow statements of practical treatment on front label panel.

PHYSICAL OR CHEMICAL HAZARDS STRONG OXIDIZING AGENT: Do not mix with other chemicals. Mix only with water. Never add water to product. Always add product to large quantities of 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 will start a chemical reaction and generate heat, hazardous gas, possible fire and explosion. In case of contamination or decomposition, do not reseal container. If possible, isolate container in open air or well ventilated area. Flood area with large volumes of water.

environmental Hazards This pesticide is toxic to fish and aquatic organisms. 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.

NOTE: Buyer assumes all responsibility for safety and use not in accordance... with direction. The SYNERGY SYSTEM is a patented method for treatment of swimming pools. Additional patents pending.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 08 1995

Mr. Paul Newcomb Bio-Lab, Inc. P. O. Box 1489 Decatur, CA 30031

Dear Mr. Newcomb:

Subject: Synergy Tabs

EPA Registration No. 5185-435

Your Amendment Dated September 29, 1994

This is in response to your amendment of updated label and two Confidential Statements of Formula (basic and an alternate formulation citing additional sources for the active ingredient, trichloro-s-triazinetrione.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable subject to the following comments.

- 1. In the ingredient statement delete the line "Total Active Ingredients: 96.6".
- 2. Include the following referral statement on the front panel: See back panel for additional precautionary statements.

A stamped copy is enclosed for your records. Submit five copies of the final printed label.

The two Confidential Statements of Formula dated September 30, 1994 (basic and an alternate formulation of additional sources for the active ingredient are acceptable.

CONCURRENCES SYMBOL SURNAME OFFICIAL FILE COPY EPA Form 1320-1A (1/90) Printed on Recycled Paper

☆ U.S. GOVERNMENT PRINTING OFFICE 1985 - 819-457

If you have any questions, please call Marianne Clark at $(703)\ 305-7879$.

Sincerely yours,

Ruth Douglas Product Manager (32) Antimicrobial Program Branch Registration Division (7505C)

SYNERGY TABS

ALGICIDE-SANITIZER-BACTERICIDE-FUNGICIDE
EXCLUSIVELY DESIGNED FOR USE WITH THE SYNERGY SYSTEM
SPECIFICALLY FORMULATED FOR USE IN AUTOMATIC AND FLOATING TYPE
CHLORINATOPS

CONTAINS ATC-3 EROSION CONTROL AGENT INCREASED SANITIZER EFFICIENCY ENHANCED SWIMMER COMFORT PATENTED TECHNOLOGY

ACTIVE INGREDIENT:

TRICHLORO-S-TRIAZINETRIONE 91.5
DISODIUM BIBORATE PENTAHYDRATE 5.0
TOTAL ACTIVE INGREDIENTS: 96.5
INERT INGREDIENTS: 3.5
TOTAL 100.0

KEEP OUT OF REACH OF CHILDREN DANGER

STATEMENTS OF PRACTICAL TREATMENT: IF CONTACT WITH EYES OCCURS: Immediately flush with cold water for at least 15 minutes. Then get immediate medical attention. IF CONTACT WITH SKIN: Brush off excess chemical and flush skin with cold water for at least 15 minutes. If irritation persists, get medical attention. If INHALED: Remove to fresh air. If breathing is difficult, have trained person administer oxygen. If not breathing, give artificial respiration. Call a physician immediately. IF SWALLOWED: Drink large amounts of water. DO NOT induce vomiting. Avoid alcohol. Never give anything by mouth to an unconscious person. Call a physician or poison control center immediately. NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. IN CASE OF MEDICAL EMERGENCY, CALL 1-303-623-5716.

MANUFACTURED BY:

BIOLAB, INC. DECATUR, GA EPA REG. NO. 5185-435

§PA EST. NO. 5185-GA-1

NET WEIGHT

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUN 0 8 1995

Under the Federal Insecticide, Pungicide, and Rodenticide Actus amended, for the pesticide registered under EPA Reg. No.

5185.435

This product is specifically formulated for use in automatic type feeders. It provides highly effective pool water sanitization and algae control when used in this manner. This combination of ingredients enhances the water quality to reduce potential eye and skin irritation. This product is formulated to dissolve more cleanly and uniformly in automatic feeders thereby reducing plugging, fouling, maintenance requirements and adjustments.

DIRECTIONS FOR USE:

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

Prior to using this product, the filter system should be properly cleaned and backwashed and the pool water pH adjusted to 7.2-7.6. It is recommended that the pool be superchlorinated to establish a chlorine residual of 1.0-3.0 ppm of free chlorine.

INITIAL APPLICATION: This product is specially designed for use in automatic type feeders except for bromine only type feeders (See Caution below). Turn the pump off before opening the feeder housing. Stand to the side of the feeder and carefully remove the feeder lid allowing any pressure that may have built up to bleed off. Inspect the resevoir and clean thoroughly if any build-up of greasy deposits, dirt or any other debris are present in the feeder. Prior to adding this product to the feeder, refer to the operating instructions provided by the manufacturer of the unit. Fill the feeder according to the operating instructions and reclose making sure the feeder lid is securely tightened. Turn on the pump to check the system for proper sealing. Adjust the feeder control rate according to the manufacturers instructions to provide a constant treatment level of 1-3 ppm sanitizer in the pool water. Proper feed rate is determined by regular testing with a SYNERGY test kit.

ROUTINE MAINTAINENCE: Test pool water regularly (at least weekly) and check feeder weekly, refilling as needed. Pools should be shocked routinely to maintain optimum water quality. Add additional product as needed to maintain a free sanitizer level of 1-3 ppm in the pool water. Regular use of a SYNERGY test kit is recommended to make certain adequate levels of sanitizer and proper pH are being maintained in the pool water.

CAUTION: Do not use this product in automatic brominators or skimmers. Use of this product through a bromine type feeder or skimmer could cause an adverse chemical reaction or explosion resulting in serious bodily injury, death or property damage.

Reentry into treated swimming pools is prohibited above levels of 3 ppm chlorine.

STORAGE AND DISPOSAL Keep this product dry in original tightly closed container when not in use. Store in a cool, dry, well ventilated area away from heat or open flame. Moisture may decompose this product and cause a violent reaction leading to fire and explosion. In case of decomposition, isolate container if possible and flood area with large amounts of water to dissolve all material before discarding this container. Do not contaminate food or feed by storage or disposal. **CONTAINER DISPOSAL:** Do not reuse container, but place in trash collection. Rinse thoroughly before discarding in trash.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER: Highly corrosive. Causes skin and eye damage. May be fatal if swallowed. Do not get in eyes, on skin or on clothing. Wear goggles or safety glasses and rubber gloves when handling this product. Irritating to nose and throat. Avoid breathing dust and fumes. Remove and wash contaminated clothing before reuse. For skin or eye contact, or if dust/fumes are inhaled, immediately follow statements of practical treatment on front label panel.

PHYSICAL OR CHEMICAL HAZARDS STRONG OXIDIZING AGENT: Do not mix with other chemicals. Mix only with water. Never add water to product. Always add product to large quantities of 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 will start a chemical reaction and generate heat, hazardous gas, possible fire and explosion. In case of contamination or decomposition, do not reseal container. If possible, isolate container in open air or well ventilated area. Flood area with large volumes of water.

ENVIRONMENTAL HAZARDS This pesticide is toxic to fish and aquatic organisms. 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.

NOTE: Buyer assumes all responsibility for safety and use not in accordance with direction. The SYNERGY SYSTEM is a patented method for treatment of swimming pools. Additional patents pending.