UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460



United States Environmental Protection Office of Pesticide Programs Agency

Mark Jernigan Federal Registration Manager Bio-Lab, Inc. PO Box 300002 Lawrenceville, GA 30049-1002

FEB 1 2 2009

FILE COPY

Subject:

Synergy Tabs

EPA Registration No. 5185-435 Application Date: December 19, 2008 Receipt Date: December 31, 2008

Dear Mr. Jernigan:

The following amendments, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are acceptable.

- Increase the re-entry level to 4ppm chlorine
- Revise Storage and Disposal Statement per PR Notice 2007-4
- Removal of First Aid Statement to Back Panel
- Minor typographical changes and corrections

General Comments:

- 1. The Antimicrobials Division is revisiting the subject of Category I placement of the First Aid statement on the label. In the interim we will allow Bio-Lab to place the First Aid statement on the back as long as "See [back] [side] panel for First Aid and additional precautionary statements" appears on the front panel.
- 2. A stamped copy of the accepted labeling is enclosed. Submit 1 copy of your final printed label before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Wanda Henson at 703-308-6345.

Sincerely,

Emily H. Mitchell Product Manager (32)

Regulatory Management Branch II

Antimicrobials Division (7510P)

{All text in brackets [xxx] is optional and may or may not be included on a final label.} {All text in braces {xxx} is administrative and will not appear on a final label.}

SYNERGY TABS

[Algicide—Sanitizer—Bactericide—Fungicide]

[Exclusively Designed For Use With The Synergy System]

[Specifically Formulated For Use In Automatic And Floating Type Feeders]

[Contains ATC-3 Erosion Control Agent]

[Increased Sanitizer Efficiency]

[Enhanced Swimmer Comfort]

[Patented Technology *]

ACTIVE INGREDIENTS:

Trichloro-s-triazinetrione	91.5%
Disodium biborate pentahydrate	5.0%
OTHER INGREDIENTS:	3.5%
TOTAL INGREDIENTS:	100.0%

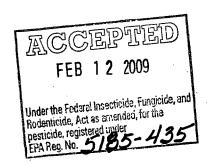
KEEP OUT OF REACH OF CHILDREN DANGER

See back panel for First Aid and additional precautionary statements.

BIOLAB, INC. PO BOX 300002 LAWRENCEVILLE, GEORGIA 30049

EPA REG. NO. 5185-435 EPA EST. NO. 5185-GA-1

NET WEIGHT



This product is specifically formulated for use in automatic and floating 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 2 ppm of free chlorine.

INITIAL APPLICATION: This product is specially designed for use in floaters and automatic type feeders except for bromine only type feeders (See Notice below). Prior to adding this product to the feeder, refer to the operating instructions provided by the manufacturer of the unit. Add to the feeder an initial supply of tablets (11 tablets per every 10,000 gallons of pool water). Close the feeder, making sure the lid is securely tightened. Adjust the feeder to the lowest setting according to the manufacturer's instructions. Approximately 3 to 4 days after adding the initial supply of tablets to the feeder, turn off the pump, open the feeder and observe the quantity of tablets remaining. If more than 1/2 of the tablets are gone contact your Synergy dealer for recommendations on how to reduce your feed rate. If at least 1/2 of the tablets remain in the feeder, turn pump back on and check the residual of sanitizer in the pool water using a test kit or test strips. Adjust the feeder to provide a sanitizer level within the ideal range of 1.0-1.5 ppm in the pool water.

ROUTINE MAINTENANCE: Test pool water regularly (at least weekly) and check feeder weekly, refilling as needed. Add additional product and adjust the feeder as needed to maintain an ideal sanitizer level of 1.0-1.5 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.

NOTICE: Do not use this product in automatic brominators. Use of this product through a bromine type feeder 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 4 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: Non-refillable container. Do not reuse or refill this container. Offer for recycling, if available. Triple rinse container (or equivalent) promptly after emptying.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: DANGER: Fatal if inhaled. Corrosive. Causes skin burns and irreversible eye damage. Harmful if swallowed or absorbed through skin. Do not breathe dust. Do not get in eyes, on skin or on clothing. Wear protective eyewear (safety glasses) and rubber gloves when handling product. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse. Wash hands before eating, drinking, chewing tobacco, or using the toilet.

{First Aid will be separated by rule lines from adjacent text and be in a different color.}

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 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 poison control center or doctor for treatment advice. IF SWALLOWED: Call 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. [IN CASE OF MEDICAL EMERGENCY, CALL [1-303-623-5716] [1-877-800-5553] [telephone number supplied by supplemental registrant].]

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

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. When using automatic feeding devices, always follow manufacturer's directions as to the proper addition of sanitizer product to chlorinators. 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 statement for end-use products in containers of less than 50 pounds (solid, dry weight).}

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

{Environmental hazards statement for end-use products in containers of equal to or greater than 50 pounds (solid, dry weight).}

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 public 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 water 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 directions.

* The SYNERGY SYSTEM is a patented method for treatment of swimming pools. Additional patents pending.

Revision 1208, PCR, 4 ppm