

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

December 8, 2023

Ashley Ashe Regulatory Affairs Team Leader KIK Consumer Products 1725 North Brown Road Lawrenceville, GA 30043 Electronic Transmittal: Ashley.Ashe@KIKCorp.com

Subject: Label Amendment – Changes Required by the Boric Acid Interim Registration Review Decision Product Name: Synergy Tabs EPA Registration Number: 5185-435 Received Date: 12/3/2018 Decision Number: 548163

Dear Ashley Ashe:

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.

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the Registration Review of the above referenced product in connection with the Boric Acid Amended Interim Registration Review Decision, and has concluded that your submission is acceptable.

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 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised

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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) 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, 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 Compliance.

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 Megan Snyderman by phone at 202-566-0639 or via email at <u>snyderman.megan@epa.gov</u>.

Sincerely,

E. Michelich

Eric Miederhoff, Branch Chief Reevaluation Branch Antimicrobials Division (7510P) Office of Pesticide Programs

Enclosure:

{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

ACTIVE INGREDIENTS: Trichloro-s-triazinetrione Disodium biborate pentahydrate OTHER INGREDIENTS: TOTAL INGREDIENTS:

91.5% 5.0% 3.5% 100.0%



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

^{*•.} 5185-435

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 [(BL)] {or} [(Z)] 7616-CA-1 [(C)]

{If multiple EPA Establishment Numbers appear on the label.} [Actual establishment shown in code above or below label printed on [bottle] [container]]

[Letter designation in lot code printed above or below on [bottle] [container] identifies actual establishment.]

NET WEIGHT

{Optional Marketing Text}

[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 *] 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 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 [or test strips] 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.

DISCHARGE DIRECTIONS FOR COMMERCIAL AND RESIDENTIAL POOL USES -Before draining a treated pool, contact your local sanitary sewer and storm drain authorities and follow their discharge instructions. Do not discharge treated pool water to any location that flows to a gutter, storm drain or natural water body unless discharge is allowed by state and local authorities. **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. Triple rinse container (or equivalent) promptly after emptying. Offer for recycling if available or place in trash.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: DANGER: Corrosive. Fatal if inhaled. Causes irreversible eye damage and skin burns. 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 use rubber gloves when handling product. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

{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: This pesticide is toxic to fish and aquatic organisms.

In the Directions for Use section see specific "Discharge Directions for Commercial and Residential Pool Uses."

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 11/30/18