

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OCT 29 2003

Mr. Mark Jernigan
Biolab, Inc.
P.O. Box 1489
Decatur, GA 30031

Subject: Formulated Chlorinating Tablets
EPA Registration Number 5185-482
Application Date: 8/20/03
Receipt Date: 8/25/03

Dear Mr. Jernigan:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the conditions listed below:

- Per the Agency's letter dated June 26, 2003

Conditions

1. You argue that since there is only 80% trichloro-s-triazinetriene in this product, rather than 100%, the product delivers less trichloro-s-triazinetriene to a treated body of water. That is not necessarily true, since dosages rates are developed based on the overall amount of material required. These amount would be increase for lower percentage products. Any claim of lower cyanuric acid is not acceptable. You must delete the claims "Less Cyanuric Acid than Regular Trichloroisocyanuric Acid Tablets", "Slower Cyanuric Acid Build-Up than Regular Trichloroisocyanuric Acid Tablets", and "20% Less Cyanuric Acid than Regular Trichloroisocyanuric Acid Tablets".
2. Delete the statement "Specially Formulated for Commercial Use". This product is not formulated for treating commercial uses.

General Comments

A stamped copy of the accepted labeling is enclosed. Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6264.

Sincerely,



Robert S. Brennis
Product Manager 32
Regulatory Management Branch II
Antimicrobials Division (7510C)

{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.}

Formulated Chlorinating Tablets

{Optional marketing statements that may be used when applying to residential swimming pools.}

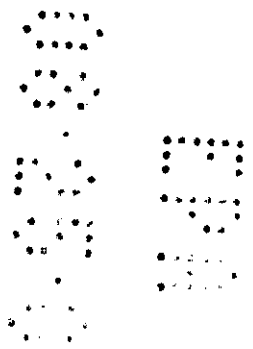
- [Provides continuous sanitation and clarification]
- [Ideal product for in-ground and above ground pools]
- [Easy to apply to skimmers and chlorinators]
- [Kills bacteria and unsightly algae]
- [For routine daily chlorination]
- [For routine daily sanitation]
- [Dual Active Ingredients Sanitize and Clarify]
- [Multi-Function with Dual Active Ingredients]
- [Enhanced Chlorinating Tablet]
- [Kills Bacteria, Kills Algae, and Clarifies]
- [Kills Bacteria, Prevents Algae, and Clarifies]
- [Kills Bacteria, Controls Algae, and Clarifies]
- [Contains Clarifiers]
- [Maintains Brilliantly Clear Water]
- [Multi Function Blue Tablets]
- [Multiple Functions for Brilliant Water]
- [Multiple Function Tablet for Above Ground Pools]
- [Sunlight Protected] {Cyanuric Acid is a known UV light stabilizer for chlorine and is intrinsic in the trichloroisocyanuric acid base molecule}
- [Sunlight Stable] {Cyanuric Acid is a known UV light stabilizer for chlorine and is intrinsic in the trichloroisocyanuric acid base molecule}
- [Controlled Chlorination]
- [Multi Purpose 3" Tablets]
- [Multi Purpose Tablets]
- [Contains BTD 4200] {name given inert ingredient}

ACCEPTED
with COMMENTS
EPA Letter Dated:

OCT 29 2003

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

5185-482



{Optional marketing statements that may be used when applying to commercial swimming pools.}

- [Provides continuous sanitation and clarification]
- [Multi-Function with Dual Active Ingredients]
- [Enhanced Chlorinating Tablet]
- [Kills Bacteria, Kills Algae, and Clarifies]
- [Kills Bacteria, Prevents Algae, and Clarifies]
- [Contains Clarifiers]
- [Sunlight Protected] *{Cyanuric Acid is a known UV light stabilizer for chlorine and is intrinsic in the trichloroisocyanuric acid base molecule}*
- [Sunlight Stable] *{Cyanuric Acid is a known UV light stabilizer for chlorine and is intrinsic in the trichloroisocyanuric acid base molecule}*
- [Contains BTD 4200] *{name given inert ingredient}*
- ~~[Less Cyanuric Acid Than Regular Trichloroisocyanuric Acid Tablets]~~
- ~~[Lower Cyanuric Acid Build Up Than Regular Trichloroisocyanuric Acid Tablets]~~
- ~~[80% Less Cyanuric Acid Than Regular Trichloroisocyanuric Acid Tablets]~~
- ~~[Specially Formulated for Commercial Use]~~
- [For Use in Feeders]
- [Triple Action Formula: Sanitizes, Prevents Algae, and Clarifies]
- [Patented]
- [US Patent # 5,674,429]
- [Less Acidic than Pure Trichloroisocyanuric Acid Products]

{Following chart is optional}

Our Ingredients:	What They Do:
Trichloro-s-triazinetriene	Sanitizes, Kills Bacteria, and Prevents Algae
Boron sodium oxide (B ₄ Na ₂ O ₇)pentahydrate	Enhances Sanitizer Efficiency And Prevents Algae
BTB 4200	Continuously Clarifies And Enhances Filtration

ACTIVE INGREDIENTS:	
Trichloro-s-triazinetriene	79.15%
Boron sodium oxide (B ₄ Na ₂ O ₇), pentahydrate	9.95%
OTHER INGREDIENTS:	10.90%
TOTAL INGREDIENTS	100.00%
(Available Chlorine 72%)	

**KEEP OUT OF THE REACH OF CHILDREN
DANGER**

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.

See [back] [side] panel for additional precautionary statements.

Net Contents:

Bio-Lab, Inc.
PO Box 300002
Lawrenceville, GA 30049

EPA REG. #: 5185-482
EPA EST. #: 5185-GA-1

{Directions to be used for residential swimming pool sanitization.}

SWIMMING POOL SANITIZER

When used as directed, this product's patented blend of sunlight protected chlorinating compound and filter enhancer is an effective way of maintaining brilliantly clear pool water. This unique [blue] tablet is multi-functional. It kills bacteria, destroys algae, and clarifies your pool water. This product provides the perfect solution for brilliant, clear, and inviting pool water and is ideal for both in-ground and above ground pools.

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.

Ensure all pool equipment is working properly. If necessary, backwash or clean the filter system following manufacturer's directions. Adjust pH to between 7.2-7.6. Add stabilizer to establish a minimum level of 20-30 PPM cyanuric acid to reduce the degrading effects of sunlight upon the chlorine residual. Superchlorinate the pool so a chlorine residual between 1-3 PPM is obtained. When using other products as outlined in directions for this product, always follow directions on those products.

This product contains a clarifier/flocculating agent that helps the filter system remove impurities from water via filtration. When necessary, backwash or clean the filter system following manufacturer's directions.

WHEN USED IN AUTOMATIC CHLORINATORS AND FLOATERS:

This product can be used in proportioning mechanisms such as automatic chlorinators and floaters as a maintenance treatment. Fill unit with this product and, following manufacturer's directions, adjust the feeding mechanism to assure a constant treatment level of 1-3 PPM available chlorine in the pool water. Use a test kit or test strips to monitor chlorine levels. Adjust the feed mechanism as needed. Check and refill the automatic chlorinator or floater as needed. Do not let this product come in direct contact with vinyl liners or other bleachable surfaces as damage may occur.

WHEN USED IN SKIMMERS:

Initially add two tablets of this product per 10,000 gallons of water or portion thereof. (**See below) Add additional product as determined by a test kit or test strip to maintain available chlorine levels of 1-3 PPM. Divide number of tablets evenly for pools with multiple skimmers. This product may be used in plastic skimmers only if skimmer and the piping between skimmer and pump are plastic. Do not add other chemicals through the skimmer when using this product in skimmer as an explosion or fire may result.

** Operate pool recirculation system approximately 10 hours per day for best results. Adjusting the hours of pool recirculation or the number of tablets added to the skimmer helps to regulate the sanitizer level. The number of tablets required and frequency of

addition will vary with the number of swimmers, water temperature, rain showers, and pump operating time.

Reentry into treated swimming pools is prohibited when chlorine levels are above 3 PPM due to risk of bodily injury.

{Directions to be used for commercial swimming pool sanitization.}

Commercial Swimming Pool Sanitizer, Algaecide, and Clarifier

This product is scientifically formulated with 20% less cyanuric acid specifically for use as a commercial pool sanitizer. It should be used in a NSF rated commercial feeder.

When used as directed, this product's patented blend of sunlight protected chlorinating compound and filter enhancer is an effective way of maintaining clean and clear pool water. This unique tablet is multi - functional. It kills bacteria, destroys algae, and clarifies your pool water. This product provides the solution for low maintenance, and clean, clear pool water. It is ideal for commercial swimming pools.

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.

Ensure all pool equipment is working properly. If necessary, backwash or clean the filter system following manufacturer's directions. Adjust pH to between 7.2-7.6. When using other products as outlined in directions for this product, always follow directions on those products.

This product contains a clarifier/flocculating agent that helps the filter system remove impurities from water via filtration. When necessary, backwash or clean the filter system following manufacturer's directions.

Use this product in feeding mechanisms such as NSF rated automatic chlorinators as a primary sanitizing agent. Fill unit with this product and adjust the feeding mechanism to assure a constant treatment level of 1-3 PPM available chlorine in the pool water. Normally, 1-2 ounces of this product per 10,000 gallons of pool water will be needed daily. Maintain proper sanitizer levels by adjusting the automatic chlorinator valves or by using a chemical controller to monitor chlorine levels and adjust the chlorine feed mechanism as needed. Check and refill the chlorinator as needed. Do not let this product come in direct contact with bleachable surfaces as damage may occur.

The number of tablets required and frequency of addition will vary with the number of swimmers, water temperature, rain showers, and pump operating time.

Reentry into treated swimming pools is prohibited when chlorine levels are above 3 PPM due to risk of bodily injury.

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. 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 burns and irreversible eye damage. May be fatal if swallowed. Harmful if absorbed through skin. 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. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

PHYSICAL OR CHEMICAL HAZARDS: STRONG OXIDIZING AGENT: Do not mix with any other chemicals except water. 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 statements 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 statements for end-use products in containers of equal to, 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 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 directions.

{The following is optional text to be used at BioLab's discretion with swimming pool use directions. This information is non-essential and will be provided only as a courtesy. Will not appear on all swimming pool products.}

HOW TO CALCULATE POOL CAPACITY

Shape of Pool Gallons of water

- Rectangular Average depth x average length x average width x 7.5
- Circular Diameter x diameter x average depth x 5.9
- Oval Full width x full length x average depth x 5.9
- Irregular Consult pool builder

{labels/5185-482.doc}