

August 22, 2005

Mark Jernigan  
Bio-Lab Inc.  
P.O. Box 300002  
Lawrenceville, GA 30049

Subject: Wonder Tab  
EPA Registration No. 5185-497  
Submission Dated: May 26, 2005  
Receipt Date: May 27, 2005

Dear Mr. Jernigan:

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

- Revised labels
  - a. Add optional marketing text
  - b. Make minor modifications to current use directions
  - c. Add optional use directions for use of product with a mesh bag in pool skimmer.

**Conditions**

1. Qualify the Apply and Swim statements with "Reentry into treated swimming pools is prohibited when free available chlorine levels are above 3PPM due to risk of bodily harm" directly below the statement.
2. The term "No waiting" is unacceptable. This product is applied and a determination must be made with regards to PPM level before re-entry. Therefore, a waiting period is invoked until a safe level has been reached.
3. The phrase "Right product for the family pool" is a comparative claim and not acceptable.

CONCURRENCES							
SYMBOL	7510C						
SURNAME	Henson						
DATE	8-22-05						

2 8/12

4. The proposed label states that "Turns the 3 Step Program into 2" but the directions for use for swimming pool sanitization says "Use in conjunction with our recommended Step 3 preventative algaecide ..." Please clarify this contradiction.

### **General Comments**

A stamped copy of the labeling accepted with conditions is enclosed. Submit a copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please call Delores Williams at (703) 308-6372.

Sincerely,

Emily H. Mitchell  
Product Manager - Team 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.}

### Wonder Tab™

{Optional marketing statements that may be used.}

- [Patented] Technology]
- [Patented Sanitizer Technology]
- [Patented Shock Technology]
- [Patented Sanitizer and Shock Technology]

- [Water Care Made Easy]
- [Simplified Water Care]
- [Redacted]
- [Convenient and Easy to Use]
- [More performance with less work\*.]

- [Weekly Pool Treatment]
- [Weekly Sanitizer and Shock [Combined]]
- [Add Weekly\*\*]
- [Lasts up to one week\*\*]
- [Easy once a week application\*\*]

- [Apply and swim in minutes†]
- [Apply and Swim†]
- [Redacted]

- [Do not mix with other products]
- [Suitable for vinyl, gunite, plaster, and aggregate pool surfaces]
- [Suitable for inground and aboveground pools]

- [Creates [Crystal Blue] Sparkling Water]
- [Clean, brilliant water]
- [Delivers clean, clear water]

- [Protects your equipment – only adds chlorine when your pump is on]
- [Delivers chlorine only when you need it [- with Smart Guard]]
- [Built-in sunlight protector]
- [Contains Sunshield™ [- protects chlorine from sunlight, so you use less]]
- [Sunlight Protected]
- [Smart Guard™ Technology]
- [Incorporates Smart Guard™ Technology]
- [Exclusive Smart Guard™ Technology]
- [Patented Smart Guard™ Technology]

**ACCEPTED**  
with **COMMENTS**  
EPA Letter Dated:

**AUG 22 2005**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 5185-497

4 8 12

[Chlorine Sanitizer, Shock, Oxidizer, and Clarifier]  
[Sanitizer and Shock in one tablet]  
[Multifunctional Chlorinating Tablets With Built-in Sanitizer, Shock, Oxidizer, and Clarifier]  
[6-in-1 Chlorinating Tablets With Built-in Sanitizer, Shock, Oxidizer, Clarifier, Sunlight Protector, and Filter Enhancer]

[Dual Layer]  
[Dual Action]  
[Dual Purpose]  
[[Blue and White] Dual Action Tablet]

[Contains Sanitizer]  
[Contains Pool Sanitizer]  
[Contains Routine Sanitizer]  
[Routine Sanitizer and Shock [Layer]]  
[Contains Fast Dissolving Shock [Layer]]  
[Contains Slow Dissolving Sanitizer [Layer] for use in Skimmers]  
[Multifunctional Shock and Sanitizer]  
[Multipurpose Shock and Sanitizer [Tablets]]  
[Chlorine Sanitizer and Shock]

[Eliminates impurities such as sun tan lotion and perspiration]  
[Eliminates contaminants]  
[Destroys contaminants]  
[Prevents algae]  
[Kills algae]  
[Kills Bacteria]  
[Oxidizes Swimmer Contaminants]

[Turns the 3-Step Program into 2]  
[Step 1 & 2]  
[Easy Skimmer Application]  
[Step 1 of a 2 Step Program]  
[Cleans, sanitizes, and shocks in one easy step]  
[Kills bacteria and shocks pool in one easy step]

[\*- When compared to 100% TCCA based tablets]  
[\*\*-See back panel for specific application directions]  
[†Refer to the re-entry statement on the back panel for further guidance]

ACCEPTED  
with COMMENTS  
EPA Letter Dated: AUG 22 2005

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 5785-497

5812

ACTIVE INGREDIENTS:  
 Trichloro-*s*-triazinetrione 66.96%  
 Sodium dichloro-*s*-triazinetrione 18.19%  
 OTHER INGREDIENTS: 14.85%  
 TOTAL INGREDIENTS: 100.00%  
 (Available Chlorine 72%)

**KEEP OUT OF REACH OF CHILDREN  
 DANGER**

**FIRST AID: IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. If irritation persists, call a poison control center or doctor for treatment advice. **IF IN EYES:** Hold eyelids open and rinse slowly and gently with cold 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 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.

BIO-LAB, INC.  
 PO Box 30002  
 Lawrenceville, Georgia

EPA REG. # 5185-497  
 EPA EST. # 5185-GA-1

NET WEIGHT:

**ACCEPTED  
 with COMMENTS  
 EPA Letter Dated:**

**AUG 22 2005**

Under the Federal Insecticide,  
 Fungicide and Rodenticide Act as  
 amended for the pesticide,  
 registered under EPA Reg. No. 5185-497

AUG 22 2005

*{Directions for swimming pool sanitization tablets applied through the skimmer, Option A}*

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 5785-497

**[Pool Sanitization] {or}**  
**[Swimming Pool Sanitizer]**

[Wonder Tab™] {or} [This product] is an easy-to-use dual layer tablet combining Steps 1 & 2 (Sanitize and Oxidize) of the [BioGuard 3 step program, making pool water care more convenient. This patented product [provides] {or} [creates] crystal blue sparkling water with an easy once-a-week application. [Wonder Tab™] {or} [This product] is a blend of oxidizers, clarifiers, and sanitizers that help keep your pool water sparkling clear. This tablet is a combination of a slow dissolving sanitizer layer and fast dissolving shock layer. [This product] {or} [Wonder Tab™] kills bacteria and eliminates contaminants in your pool. Use in conjunction with our recommended Step 3 preventative algaecide for the ultimate swimming experience.

{or}

**[Pool Sanitization] {or}**  
**[Swimming Pool Sanitizer]**

Wonder Tab is an easy to use dual layer tablet that combines Steps 1&2 of the [BioGuard] 3-step program to make pool care more convenient. This patented tablet shocks, sanitizes, and clarifies to keep your pool brilliantly clear with an easy once a week application. Wonder Tab combines a slow dissolving sanitizer layer and a fast dissolving shock layer. [This product] {or} [Wonder Tab™] kills bacteria and destroys contaminants in your pool. Use with our recommended Step 3 preventative algaecide for [the ultimate] {or} [an enjoyable] swimming experience.

{or}

**[Pool Sanitization] {or}**  
**[Swimming Pool Sanitizer]**

With Wonder Tab hard at work, you can get back to doing what you love best - having fun with family and friends. [Omni] [Sun] [AquaChem][BioGuard] makes it easy by giving you one more way to get the beautiful pool water you [expect] [want] with a minimum amount of effort.

**DIRECTIONS FOR USE:** It is a violation of Federal Law to use this product in any manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

**BEFORE APPLYING PRODUCT:**

Ensure all pool equipment is working properly. Consult your [BioGuard] {or} [swimming pool] dealer for additional water balance and start-up procedures. Test the water's pH, total alkalinity, and calcium hardness and adjust to the correct level. Adjust pH to 7.2-7.6. Adjust total alkalinity to 80-125 PPM for plaster pools, 125-150 for vinyl or fiberglass pools using [Balance Pak® 100] {or} [alkalinity increaser]. Adjust calcium hardness to 200-275 PPM for plaster pools, 175-225 for vinyl or fiberglass pools using [Balance Pak® 300] {or} [calcium hardness increaser]. Backwash filter and use [Strip Kwik®] {or} [a filter cleaner] to chemically clean the filter. Add [a stabilizer] {or} [Stabilizer 100™] to establish a minimum stabilizer level of 30-40

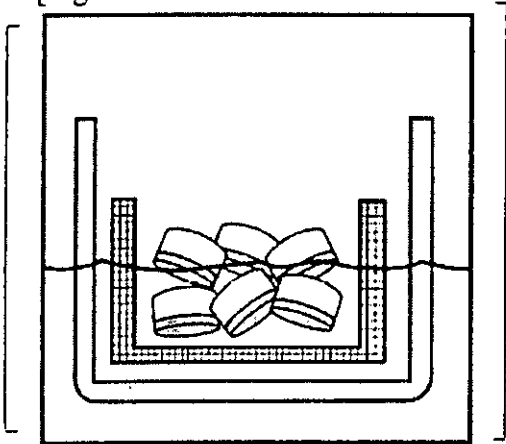
PPM. Superchlorinate pool with [a granular chlorinating product] {or} [Chlorinating Granules Plus™] {or} [BioGuard Burn Out Extreme] {or} [BioGuard Master Dichloro Dihydrate] {or} [BioGuard Smart Shock] {or} [Swimming Pool Product Z] to obtain a free available chlorine level between 1-3 PPM. When using other products as outlined in the directions for this product, always follow label directions for those products.

**START-UP/INITIAL TREATMENT:**

[Wonder Tab™] [This product] should be added through the skimmer only. If there are multiple skimmers, divide the tablets evenly among the skimmers. Make sure skimmers are free of debris. (\*\*See below)

With the pump operating and a free available chlorine level of at least 1.0 PPM, add four (4) tablets per 10,000 gallons of pool water. It is not necessary to completely submerge all tablets during the initial application. For best results, place the tablets in the skimmer with the blue shock layer facing down. [See Figure 1]. Operate pump between 10 - 12 hours per day in order to form the protective skin that reduces the erosion from the sanitizer portion of the tablet. Test the free available chlorine level using test strips or a test kit. Do not enter pool if free available chlorine level is above 3.0 PPM. When free available chlorine level is adjusted to 1-3 PPM, add a maintenance dosage of [Back-Up®] {or} [Algae All 60] {or} [an algacide].

[Figure 1: Tablets stacked in skimmer with blue shock layer facing down. ]



ACCEPTED  
with COMMENTS  
EPA Letter Dated:

**AUG 22 2005**

Under the Federal Insecticide,  
Fungicide and Rodenticide Act as  
amended for the pesticide,  
registered under EPA Reg. No. 5185-497

**ROUTINE MAINTENANCE:**

Test free available chlorine level regularly. About once a week, with pump operating, add (4) [Wonder Tab™] tablets per 10,000 gal. to skimmer to maintain a constant free available chlorine level of 1 - 3 PPM. It is not necessary to remove tablet remnants from skimmer basket(s). Simply check skimmer often and add additional tablet(s) as needed.

Operate pump between 10 - 12 hours per day in order to form the protective skin that reduces the erosion from the sanitizer portion of the tablet. If pump run time exceeds 12 hours per day, before adding additional tablets, test free available chlorine level. If the free available chlorine level is above 3 PPM, do not add additional tablets.

You may occasionally need to shock your pool with [a granular chlorinating product] [Chlorinating Granules Plus™] [BioGuard Burn Out Extreme] [BioGuard Master Dichloro Dihydrate] [BioGuard

8 8 12

Smart Shock] *{or}* [Swimming Pool Product Z] *{or}* [Swimming Pool Product Z] after heavy rain or heavy pool use to help keep your water properly maintained.

\*\*\*The number of tablets and frequency of addition will vary with sunlight, rainfall, water temperature, number of swimmers, and pump operation. Test pool water frequently during initial use with a test kit or test strips to determine when it is necessary to add another dose of [Wonder Tab™] *{or}* [this product] to maintain a chlorine level of 1-3 PPM.

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

**ACCEPTED  
with COMMENTS  
EPA Letter Dated:**

**AUG 22 2005**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 5185-497



9 8 12

ACCEPTED  
with COMMENTS

EPA Letter Dated:

AUG 22 2005

{Directions for swimming pool sanitization tablets applied through the skimmer using a BioLab, Inc. supplied mesh bag. Use of the mesh bag is not a requirement for product application. Option B}

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 5785-497

[Pool Sanitization] {or}  
[Swimming Pool Sanitizer]

[Wonder Tab™] {or} [This product] is an easy-to-use dual layer tablet combining Steps 1 & 2 (Sanitize and Oxidize) of the [BioGuard] 3 step program, making pool water care more convenient. This patented product [provides] {or} [creates] crystal blue sparkling water with an easy once-a-week application. [Wonder Tab™] {or} [This product] is a blend of oxidizers, clarifiers, and sanitizers that help keep your pool water sparkling clear. This tablet is a combination of a slow dissolving sanitizer layer and fast dissolving shock layer. [This product] {or} [Wonder Tab™] kills bacteria and eliminates contaminants in your pool. Use in conjunction with our [BioGuard] recommended Step 3 preventative algacide for the ultimate swimming experience.

{or}

[Pool Sanitization] {or}  
[Swimming Pool Sanitizer]

Wonder Tab is an easy to use dual layer tablet that combines Steps 1&2 of the [BioGuard] 3- step system to make pool care more convenient. This patented tablet shocks, sanitizes, and clarifies to keep your pool brilliantly clear with an easy once a week application. Wonder Tab combines a slow dissolving sanitizer layer and a fast dissolving shock layer. [This product] {or} [Wonder Tab™] kills bacteria and destroys contaminants in your pool. Use with our recommended Step 3 preventative algacide for [the ultimate] {or} [an enjoyable] swimming experience.

{or}

[Pool Sanitization] {or}  
[Swimming Pool Sanitizer]

With Wonder Tab hard at work, you can get back to doing what you love best - having fun with family and friends. [Omni] [Sun] [AquaChem][BioGuard] makes it easy by giving you one more way to get the beautiful pool water you [expect] [want] with a minimum amount of effort.

**DIRECTIONS FOR USE:** It is a violation of Federal Law to use this product in any manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

**BEFORE APPLYING PRODUCT:**

Ensure all pool equipment is working properly. Consult your [BioGuard] {or} [swimming pool] dealer for additional water balance and start-up procedures. [Test the water's pH, total alkalinity, and calcium hardness and adjust to the correct level.] Adjust pH to 7.2-7.6. Adjust total alkalinity to 80-125 PPM for plaster pools, 125-150 for vinyl or fiberglass pools using [Balance Pak® 100] {or} [alkalinity increaser]. Adjust calcium hardness to 200-275 PPM for plaster pools, 175-225 for vinyl or fiberglass pools using [Balance Pak® 300] {or} [calcium hardness

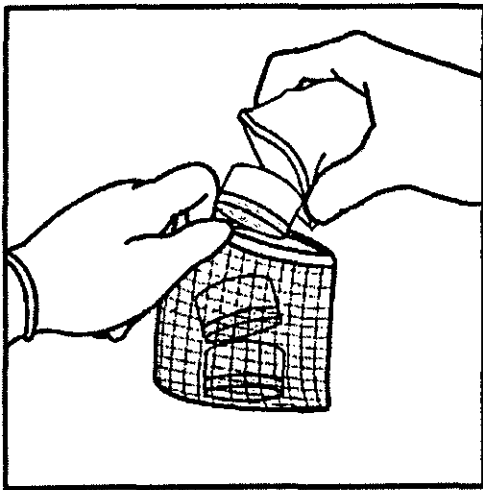
increaser]. Backwash filter and use [Strip Kwik®] {or} [a filter cleaner] to chemically clean the filter. Add [a stabilizer] {or} [Stabilizer 100™] to establish a minimum stabilizer level of 30-40 PPM. Superchlorinate pool with [a granular chlorinating product] {or} [Chlorinating Granules Plus™] {or} [BioGuard Burn Out Extreme] {or} [BioGuard Master Dichloro Dihydrate] {or} [BioGuard Smart Shock] {or} [Swimming Pool Product Z] to obtain a free available chlorine level between 1-3 PPM. When using other products as outlined in the directions for this product, always follow label directions for those products.

**START-UP/INITIAL TREATMENT:**

[Wonder Tab™] [This product] should be added through the skimmer only. If there are multiple skimmers, divide the tablets evenly among the skimmers. Make sure skimmers are free of debris. (\*\*See below) We have provided mesh [bags] {or} [pouches] for your convenience.

Remove the provided mesh [bags] {or} [pouches] from the pail. Please inspect the [bags] {or} [pouches] and discard if they are damaged. With the pump operating and a free available chlorine level of at least 1.0 PPM, unwrap and place four (4) tablets per 10,000 gallons of pool water into the mesh [bags] {or} [pouches]. [See[Figure 1]. Note: each [bag] {or} [pouch] will hold three tablets. To place the tablets in the mesh [bag] {or} [pouch], first open the wrapped tab by grasping the tablet through the wrapper with one hand and carefully tearing open the tablet wrapper with the other. Next, open the mesh [bag] {or} [pouch] with your free hand and gently drop the tablet out of the wrapper into the mesh [bag] {or} [pouch]. To clean debris from the skimmer, lift the mesh [bag] {or} [pouch] with the tablets from the skimmer, remove debris, and replace the mesh [bag] {or} [pouch] and tablets.

[Figure 1: Adding tablets to mesh [bag] {or} [pouch]].



**ACCEPTED  
with COMMENTS  
EPA Letter Dated:**

**AUG 22 2005**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 5185-497

Operate pump between 10 - 12 hours per day in order to form the protective skin that reduces the erosion from the sanitizer portion of the tablet. Test the free available chlorine level using test strips or a test kit. Do not enter pool if free available chlorine level is above 3.0 PPM. When free available chlorine level is adjusted to 1-3 PPM, add a maintenance dosage of [Back-Up®] {or} [Algae All 60] {or} [an algaecide].

11 8 12

**ROUTINE MAINTENANCE:**

Test free available chlorine level regularly. About once a week, with pump operating, add (4) [Wonder Tab™] tablets per 10,000 gal. to the mesh [bag] {or} [pouch] and place them in the skimmer to maintain a constant free available chlorine level of 1 – 3 PPM. Note: each [bag] {or} [pouch] will hold three tablets. Do not remove tablet remnants from skimmer basket(s). Simply check skimmer often and add additional tablet(s) as needed.

Note: If pump run time exceeds 12 hours per day, before adding additional tablets, test free available chlorine level. If the free available chlorine level is above 3 PPM, do not add additional tablets.

You may need to shock your pool with [a granular chlorinating product] [Chlorinating Granules Plus™] [BioGuard Burn Out Extreme] [BioGuard Master Dichloro Dihydrate] [BioGuard Smart Shock] {or} [Swimming Pool Product Z] {or} [Swimming Pool Product Z] after heavy rain or heavy use to help keep your pool water properly maintained.

\*\*\*The number of tablets and frequency of addition will vary with sunlight, rainfall, water temperature, number of swimmers, and pump operation. Test pool water frequently during initial use with a test kit or test strips to determine when it is necessary to add another dose of [Wonder Tab™] {or} [this product] to maintain a chlorine level of 1-3 PPM.

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

**ACCEPTED  
with COMMENTS  
EPA Letter Dated:**

**AUG 22 2005**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 5785-497

ACCEPTED  
with COMMENTS  
EPA Letter Dated:

12 8 12

AUG 22 2005

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 5185-497

**STORAGE AND DISPOSAL:**

**STORAGE :** 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.

**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:** Corrosive: Causes irreversible eye damage. Causes skin irritation. Harmful if swallowed or absorbed through skin. Harmful if inhaled. Avoid breathing dust. Do not get in eyes, on skin or on clothing. Wear safety glasses, protective clothing and rubber gloves when handling this product. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove and wash contaminated clothing before reuse.

**PHYSICAL OR CHEMICAL HAZARDS: CONTAINS A 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 other chemicals through the skimmer when using this product- an explosion might occur. Do not add this product to any dispensing device. 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 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 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.