

5185-497

11/10/2008

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

November 10, 2008

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

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

Subject: Wonder Tab
EPA Registration No. 5185-497
Application Date: August 12, 2008
Receipt Date: August 14, 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:

- Revise in response to Agency letter dated 07/10/08
- Add of marketing claims
- Clarify Directions for Use

General Comments

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
Acting Product Manager (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)

CONCURRENCES

SYMBOL	7510P	7510P						
IRNAME	EK Beta	E. Mitchell						
DATE	11/10/08	11/18/08						

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{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[®]

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

See [back] [side] panel for First Aid and additional precautionary statements.

BIO-LAB, INC.

PO Box 300002

Lawrenceville, Georgia 30049

EPA REG. NO. 5185-497

EPA EST. NO. 5185-GA-1

NET WEIGHT: {as indicated on container}

ACCEPTED
NOV 10 2008
Under the Federal Insecticide, Fungicide, and
Rodenticide, Act as amended, for the
pesticide, registered under
EPA Reg. No. **5185-497**

{Optional marketing statements that may be used.}

[Patented] Technology
[Patented Sanitizer Technology]
[Patented Shock Technology]
[Patented Sanitizer and Shock Technology]
[US Patent # 6,863,830]
[Made in USA]

[Water Care Made Easy] [Simplified Water Care]
[Convenient and Easy to Use]
[More performance with less work*.]
[*- When compared to 100% TCCA based tablets]

[Weekly Pool Treatment]
[Weekly Sanitizer and Shock [Combined]]
[Once a Week**]
[Add Weekly**]
[Lasts up to one week**]
[Easy once a week application**]
[**-See back panel for specific application directions]
[**Approximate addition rate. Please refer to directions for use.]

[Apply and swim in minutes†]
[Apply and Swim†]
[Apply and swim in as little as 15 minutes†]
[† Reentry into treated swimming pools is prohibited when free available chlorine levels are above 4 PPM due to risk of bodily harm.] {This footnote must appear on the front panel when required for use with one of the "Apply and Swim" statements.}

[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]
[SmartGuard® Technology]
[Incorporates SmartGuard® Technology]
[Exclusive SmartGuard® Technology]

[Patented SmartGuard® Technology]

[Chlorine Sanitizer, Shock, Oxidizer, and Clarifier]

[Sanitizer and Shock in one tablet]

[Chlorinating sanitizer and shock]

[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]

[Dual function]

[[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]

[Sanitizer and Shock/Oxidizer]

[Eliminates impurities such as sun tan lotion and perspiration]

[Eliminates contaminants]

[Destroys contaminants]

[Prevents algae]

[Kills algae]

[Kills Bacteria]

[Oxidizes Swimmer Contaminants]

[Steps 1 & 2]

[Easy Skimmer Application]

[Convenient skimmer application]

[Steps 1 & 2 of a 3 Step Program]

[Steps 1 & 2 of a 3 Step System]

[Cleans, sanitizes, and shocks in one easy step]

[Kills bacteria and shocks pool in one easy step]

[Sanitize and shock in one convenient step]

[Sanitize and shock in one easy step]

[One step sanitizer and shock]

[Ideal for use with BioLab UV system]

[Suitable for use with BioLab UV system]

[Compatible with BioLab UV system]

[BioLab UV system approved.]

[Maintain] *{Designates that this product is part of maintenance line of products}*

[BioGuard Care System]

{The "BioGuard Care System" below may be placed on the label to allow easy product identification by consumers.}

[BioGuard Care System (X) Sanitizer (X) Shock () [Algaecide][Algicide]]

{To maintain brand segmentation, several sets of marketing statements are provided to maintain separate brand identity. One of the following Options will be used on the label.}

[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]

[This product] {or} [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®] [Aqua Chem®][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.

{or}

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

[BioGuard® has a wide variety of products that are required to maintain a high quality swimming environment. These products are designated as "Maintain".]

[The BioGuard® Care System has three important parts that help you maintain crystal blue sparkling water.

- A Sanitizer to control bacteria
- A Shock to destroy contaminants
- A Preventative [algaecide][algicide] to stop algae before it starts

All parts of the BioGuard Care System are vital to achieve beautiful water.]

[This product] {or} [Wonder Tab®] is dual action tablet that both sanitizes and shocks your pool all in one product. [This product] {or} [Wonder Tab®] satisfies the sanitizer and the shock components of the BioGuard Care System. Weekly use of [this product] {or} [Wonder Tab®] keeps your water crystal blue and sparkling. Utilizing an advanced patented technology, [this product] {or} [Wonder Tab®] performs multiple functions:

- kills bacteria and algae [as well as prevents algae growth]
- Destroys organic contaminants that cause cloudy water, musty odors and eye irritation
- clarifies the water using a filter enhancer

This [premium] [unique] product is easy to use. Just place the appropriate number of [this product] {or} [Wonder Tab®] in your skimmer basket(s) with your pump running. The blue shock layer will dissolve quickly shocking your pool. The white layer will last about one week, sanitizing your water. [This product] {or} [Wonder Tab®] is suitable for all pool types.

To complete the BioGuard Care System use [this product] {or} [Wonder Tab®] with a weekly preventative algacide [such as] [BioGuard Back-Up®] [or] [and] [BioGuard Banish®][or] [and] [BioGuard Algae All 60®].

[BioGuard Wonder Tab® can be used weekly as a sanitizer and maintenance shock when using the BioLab UV system].

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. Clean or backwash filter following manufacturer's directions. Adjust pH to between 7.2-7.6. In chlorinated pools, add stabilizer to establish a minimum stabilizer level of 30-40 ppm to reduce the degradative effects of sunlight upon the chlorine residual. [Superchlorinate]{or}[Shock] pool to obtain a free available chlorine level between 1-4 ppm. When using other products as outlined in the directions for this product, always follow directions on those products.

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

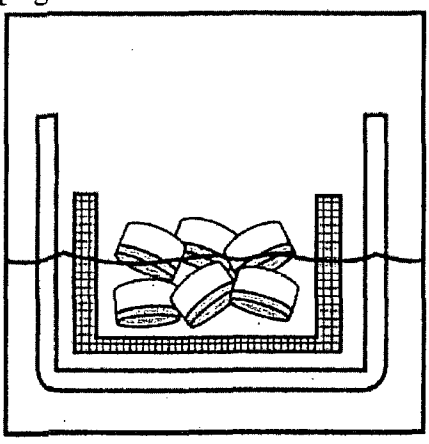
[Wonder Tab[®]] {or} [This product] should be added through the skimmer only. If there are multiple skimmers, divide the tablets evenly among the skimmers. Make sure skimmers are free of debris. (**See below)

Step 1. (Initial Treatment) With the pump operating, unwrap and place 2 (two) tablets per 5000-7500 gallons of pool water in the skimmer with the blue shock layer facing down. The blue shock layer must be completely submerged, but it is not necessary to completely submerge the entire tablet. [See Figure 1]. Operate pump between 10 - 12 hours 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 4 ppm. When free available chlorine level is adjusted to 1-4 ppm, add a maintenance dosage of [BioGuard Back-Up[®]] [or] [BioGuard Banish[®]] [or] [BioGuard Algae All 60[®]] {or} [an [algaecide][algicide]].

Step 2. (Routine Maintenance) Operate pump between 10 - 12 hours per day. Test free available chlorine regularly. If the free available chlorine level is above 4 ppm, do not add additional tablets. When free available chlorine falls below 1 ppm, reapply 2 (two) tablets per 5000-7500 gallons of pool water, following application described in Step 1.

You may occasionally need to shock your 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] [BioGuard Master Lithium Hypochlorite] [or] [Swimming Pool Product Z] after heavy rain or heavy pool use to help keep your water properly maintained.

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



***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 1-4 ppm.

Reentry into treated swimming pools is prohibited when free available chlorine levels are above 4 ppm due to risk of body injury.

{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}

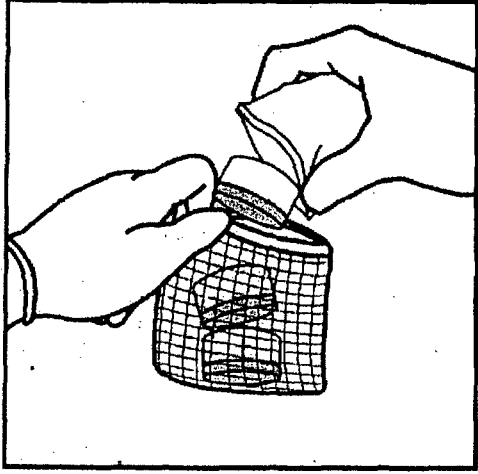
[Wonder Tab[®]] {or} [This product] should be added through the skimmer only. If there are multiple skimmers, divide the tablets evenly among the skimmers. Make sure skimmers are free of debris. (**See below) We have provided mesh [bags] {or} [pouches] for your convenience, however, product may be applied directly to skimmer without mesh [bags] {or} [pouches].

Step 1. (Initial Treatment) Remove the provided mesh [bags] {or} [pouches] from the pail. Inspect the mesh [bags] {or} [pouches] and discard if they are damaged. With the pump operating and a free available chlorine level of at least 1 ppm, unwrap and place 2 (two) tablets per 5000-7500 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 tablet. Next, open the mesh [bag] {or} [pouch] 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. Operate pump between 10 - 12 hours 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 4 ppm. When free available chlorine level is adjusted to 1-4 ppm, add a maintenance dosage of [BioGuard Back-Up[®]] [or] [BioGuard Banish[®]] [or] [BioGuard Algae All 60[®]] {or} [an [algaecide][algaecide]].

Step 2. (Routine Maintenance) Operate pump between 10 - 12 hours per day. Test free available chlorine regularly. If the free available chlorine level is above 4 ppm, do not add additional tablets. When free available chlorine falls below 1 ppm, reapply 2 (two) tablets per 5000-7500 gallons of pool water, following application described in Step 1. Re-use mesh [bags] {or} [pouches] for subsequent applications.

You may occasionally need to shock your 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] [BioGuard Master Lithium Hypochlorite] [or] [Swimming Pool Product Z] after heavy rain or heavy pool use to help keep your water properly maintained.

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



***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 1-4 ppm.

Reentry into treated swimming pools is prohibited when free available chlorine levels are above 4 ppm due to risk of body injury.

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: 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: 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.

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

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.

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{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.