

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

MAR 1 2 2007

Mark Visconti Alden Leeds, Inc. 55 Jacobus Ave. South Kearny, NJ. 07032

RE:

Label Amendment Dated December 12, 2006

Product Name: Nu-Clo Slow Dissolving Chlorinating Tablets

EPA Registration Number: 7124-12

Dear Mr. Visconti:

The Agency has reviewed your submission submitted in accordance with continuing registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA), as amended, and determined the action to be conditionally acceptable.

In summary, your request to add marketing language is partly acceptable. The "Disinfects" and "Kills Bacteria" claims can not be added without submission of or, citation of supporting product performance data. You must reorder the First Aid treatment protocol in accordance with the Chlorinated Isocyanurates Reregistration Eligibility Decision of September 1992. Treatment for Eyes must appear first, then Skin, then Swallowed, then Inhaled. In addition, correct the following typos as indicated: cartridge, chlorine, punch. A copy of your stamped accepted label is enclosed.

If you have questions concerning this letter, please contact Tom Luminello by telephone, (703) 308-8075, or by e-mail at luminello.tom@epa.gov.

Sincerely

Emily H. Mitchell
Product Manager 32

Antimicrobials Division (7510-P)

Enclosure

SLOW DISSOLVING CHLORINATING TABLETS

with COMMENTS In EPA Letter Doled: MAR 12 2007

TI24-12

Moca

• Automatic Chlorination • Lasts up to 4 weeks! Filled with 1", 1/2 oz. Slow Dissolving Chlorinating Tablets Fits EZ CHLOR, GUARDEX, CHLOR-TROL, Swan type feeders and various float rings

• 100% soluble • UV stabilized - 24 hour chlorine residual • For chlorinator cartridgr refill

• Slow dissolving • Disinfects, kills algae an Opacteria • 1" Chlorinating • 1/2 ounce

NET WT. 4 LBS. (1.8 kg)

KEEP OUT OF REACH OF CHILDREN

DANGER

SEE FIRST AID STATEMENT AND OTHER PRECAUTIONS ON BACK PANEL BEFORE OPENING CONTAINER DANGER: Corrosive. Causes irreversible eye damage and skin burns. May be fatal if absorbed through skin. May be fatal it inhaled. Do not breath dust or spray mists. kritating to nose and throat, Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Wear googles or face shield, protective clothing and rubber gloves when handling this product. Wash thoroughly with soan and water after handling and before sating, drinking or using tobacco. Remove contaminated clothing and wash before reuse. FIRST AID:

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sig a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

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.

(14) 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 a poison control center or doctor for further treatment advice.

AF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 Aminutes. Remove contact tenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. FNVIRONMENTAL HAZARDS: This product is toxic to fish. Do not discharge

sent containing this product into takes, streams, ponds, estuaries, oceans other waters unless in accordance with the requirements of a National rollulant 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.

PHYSICAL AND CHEMICAL HAZARDS; STRONG OXIDIZING AGENT, Mix only with water. Use clean dry utensits. 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 may start a chemical reaction with generation of heat, liberation of hazardous gasses and possible generation of fire and explosion.

SPECIAL PRECAUTIONS PLEASE READ BEFORE OPENING CONTAINER PREVENTION OF PHYSICAL INJURY

1. This product emits a powerful chlorine gas. Do not open container indoors: Hold away from face when opening to avoid breathing fumes.

2. This product is dangerous when not used properly: MISUSE MAY RESULT IN SERIOUS PERSONAL INJURY REQUIRING HOSPITALIZATION

RELATED COMPLICATIONS MAY LEAD TO DEATH Do not mix with any other chemicals

Mixing with other chemicals may cause a violent and instantaneous chemical reaction

Do not add water to this product -Do not add this product to water in a pail -Do not take advice from others. Do not experiment-follow label instructions exactly.

PREVENTION OF PROPERTY DAMAGE: Contact between this product in its ssolved state and vinyl liners, painted surfaces or other property in or and the pool will result in permanent bleaching of the color

These tablets are manufactured with the most concentrated form of dry chlorine available today. They are consistent in size and slow dissolving in nature to allow you to reliably dose your pool once a week. These tablets contain cyanuric acid - a stabilizer that prevents ultraviolet light from removing available chlorine from the pool. These tablets allow you to easily maintain proper chlorine residuals and help you to effortlessly maintain beautiful, dean sparkling water. These tablets are designed for use in off-line, flow through, soaker-type chlorinating devices. Follow the manufacturer's directions for use supplied with your particular device.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

1. Adjust water pH to 7.2 - 7.6 as determined by a test kit. For pools with copper plumbing best pH factor is 7.6 -7.8.

2. If the pool has not been previously stabilized add Conditioner and Stabilizer (cyanuric acid). Follow the directions for use on the label for that product.

3. Use a shock treatment to establish a chlorine residual. Follow the instructions for use on the label for that product. If there is no chlorine residual

on the following day repeat the desage until chlorine residual of at least 1 ppm is found 24 hours later without additional dosages.

4. Follow directions for use with your particular feeding device as prescribed.

During heat waves or periods of heavy bathing loads more chlorine will be required per day to maintain blumpresidual. Also check pH to keep in proper range as pH has a direct affect on chlorine residual. The pH of these tablets is on the acid side and will tend to reduce the pH and total alkalinity of the pool water. Also, the pH should be brought back into range when it falls or climbs due to rain, makeup water, windblown dust or any other reason, by the periodic additions of sodium carbonate or sodium hydrogen carbonate to raise pH, or sodium bisulfate to lower pH.

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WHEN USED TO FILL CHLORINATOR: 1. Fill chlorinator with tablets. The rate of solution of the tablets depends upon

the volume of water flowing through the chlorinator. Keep chlorine residual in pool above 1 pom at all times.

2. Adjust valves on chlorinator so that water flow can be observed passing through. Keep chloring residuals between 1 and 2 ppm by increasing or decreasing flow with proper valve settings. Pool should not be entered until the chlorine residual is below 3.0 ppm.

Cartridge Configuration #1 PRINCIPLES OF OPERATION

Most automatic cartridge type feeding devices commonly used are adjusted by varying the amount of water exposed to these tablets. This is done in a combination of ways:

1. Increasing/decreasing the flow of water over the tablets.

Increasing/decreasing the number of tablets exposed to the water.

Water flow is changed by adjusting a valve supplying the water to the chemical chamber and/or punching or alternately covering additional hotes on the cartridge.

The number of tablets exposed to the water is adjusted by regulating the level of the water in the chlorinator or alternately regulating the level of the cartridge in the water.

DIRECTIONS FOR USE

Following the manufacturers instructions for use for your particular chlorinator. pre-punch or slice the appropriate dimples on the cartridge and insert into the chlorivator. Test water frequently using a reliable test kit to maintain a chlorine residual of between 1 and 1.5 ppm at all times. Adjusting chlorination rate as per PRINCIPLES OF OPERATION above.

Cartridge Configuration #2
INSTRUCTIONS FOR USE IN EZ CHLOR TYPE FEEDER: Chlorination feed rate is regulated by the height of the water flowing within the cartridge and the amount of water flowing through the feeder.

1. Using the tool provided with the feeder, punch out the first three holes on either side of the cap and of the castridge and resouve the protective sticky paper from the can.

2. Place the cartridge into the feeder and turn until it drops into place. Test water frequently using a reliable test kit to maintain a chlorine residual of water inclinately using a remained wat as too high, reduce flow through the flow meter. If chlorine level is too liow, increase flow through meter or punch the next set of holes. The next highest holes should be punched as needed to maintain the required chloring residual.

INSTRUCTIONS FOR USE IN SYLVAN TYPE FEEDER:

 Using a sharp tool, punch out the first three holes on either side of the cap. end of the cartridge and remove the protective sticky paper from the cap.

2. Screw the cartridge into the thread provided on the underside of the skimmer cover and reassemble the skimmer. Check ciliforine residual with a reliable test kit and regulate litter cycles to maintain a chloring residual of between 1.0-1.5 porn. If necessary, more holes may be punched to maintain at all times the prescribed dosage

INSTRUCTIONS FOR USE WITH FLOAT RINGS:

Use of this cartridge in viry! lined pools is not recommended as particles of chlorine may fall out and cause discoleration of the viry!

Before placing cartridge into float use a sharp tool to punch out the first three holes on either side of the small and of the cartridge, and one additional set of holes for each 5,000 gallons of pool capacity above 10,000 gallons. Remove protective tabel from cap,

Additional holes may be cut off to allow increased circulation so as to maintain a chlorine residual at all times of between 1.0-1.5 ppm determined through the use of a reliable test kit. In addition, greater chlorination will occur if the floating cartridge is located in an area of high agitation, such as when it is tied with a piece of fishing line near the inlet of the pools filtration system. Conversely, lesser chilorination may be accomplished by moving the assembly further from areas of high agitation.

Cartridge Configuration #3

INSTRUCTIONS FOR USE IN EZ CHLOR TYPE FEEDER:

Chlorination feed rate is regulated by the height of the water flowing within the cartridge and the amount of water flowing throught the feeder Using a knite, slice off all #1 tabs at the bottom of the cartridge.

2. Use the tool supplied with feeder to punch out one hole on the canister corresponding to your pool size as outlined below:

avrraga
5.000
10.000
15.000(
20.000[

25 000-30.000

3. Place the cartridge into the feeder and turn until it drops into place.

Test water frequently using a reliable test kit to maintain a chlorine residual of between 1.0-1.5 ppm. If chlorine level is too high, reduce flow through the flow meter. If chloring level is too low, increase flow through meter or slice off one of the #2 tabs. The next highest holes should be punched or additional tabs sticed off as needed to maintain the required chlorine residual. Flow valve should be adjusted to limit the flow of chlorine entering the water.

INSTRUCTIONS FOR USE IN GUARDEY TYPE FEEDER:

Chlorination feed rate is regulated by the height of the cartridge in the feeder and the amount of water flowing through the feeder.

1. Using a knife, slice off all #1 fabs at the bottom of the cartridge.

2. Using the tool supplied with feeder, punch out the holes marked "VENT" 3. Using the following chart, choose the number that best approximates the

size, in gailons, of your pool.

II.
10,0001
15,0002
20.0003
25,0004
30.0005
35,0006
40.0007

4. Insert the cartridge into the feeder to the number chosen above, and twist 1/6 of a turn to engage raised steps.

5. Test water frequently using a reliable test kit to maintain a chlorine residual of between 1 and 1.5 ppm. If chlorine level is too high, reduce flow through the flow meter or twist cartridge out and reinsert one step higher at the next lowest number. If highest settings will not supply enough chemical, additional tabs should be sliced off in successive order and the cartridge repositioned so as to maintain the prescribed chlorine residual as determined by a reliable test

INSTRUCTIONS FOR USE IN CHLOR-TROL TYPE FEEDER:

Chlorination feed rate is regulated by the height of the cartridge in the feeder and the amount of water flowing through the feeder.

Using a knife, slice off all #1 tabs at the bottom of the certridge.
 Using the tool supplied with feeder, punch out the hole marked "VENT".

3. Position the cartridge in the feeder with step marked "" over the leti adjustment quick and "if facing you. Test water frequently using a reliable test kit to maintain a chlorine residuel of between 1 and 1.5 ppm. If chlorine level is too high, reposition chlorinator pine step toward "LESS". If chlorine level is too low, reposition chlorinator one step toward "MORE", If necessary, additional tabs may be sliced off and the cartridge raised or lowered on the steps so as to maintain the prescribed chloring residual as determined by a reliable test kit.

INSTRUCTIONS FOR USE WITH FLOAT RINGS: Use of this cartridge in vinyl liged pools is not recommended, as particles of

chlorine which may fall out can cause discoloration of the vinyl, Before setting cartridge into float, use a sharp tool to slice off the three "A" tabs on the small end of the cartridge and punch one set of holes for each 5,000 gallons of pool capacity above 10,000 gallons. Additional holes may be punched to allow increased circulation so as to maintain a chlorine residual at all times of between 1.0-1.5 ppm as determined through the use of a reliable test kit. In addition, greater chlorination will occur if the floating cartridge is located in an area of high agitation, such as when it is tied with a piece of fishing line near the inlet of the pool's filtration system. Conversely, lesser chlorination may be accomplished by moving the assembly further from the area of high agitation.

Cartridge Configuration #4

INSTRUCTIONS FOR USE IN KRATZ TYPE FEEDER:

Chlorination feed rate is regulated by the height of the stake within the cartridge and the amount of water flowing through the feeder

1. Using a knife, slice off all of the elevated dimples on the cap end of the cartridge.

2. Remove child resistant cap from end of cartridge. LEAVE CAP PLUG IN

3. At small end of cartridge, slice off the first small round hole

4. Insert cap end into feeder and push down over the central stake

5. Follow chlorinator instructions to regulate chlorine level in pool, increasing height of stake or flow to increase chlorination or decrease chlorination. Always remember to maintain a chlotine residual of between 1.0-1.5 ppm as determined through the use of a reliable test kit.

INSTRUCTIONS FOR USE IN FOXYORK TYPE FEEDER: Chlorination feed rate is regulated by the height of the cartridge in the feeder

and the amount of water flowing through the feeder. 1. Using knife, slice off the 4 rectangular protrusions on the circumference of the small threaded end.

2. At cap end of cartridge, cut a small vent hole through one of the protrusions adjacent to the cap.

3. Rate of chlorination may be adjusted by screwing the cartridge into the chlorinator for more chlorine and out for less. In addition, follow chlorinator instuctions to maintain chloring residual of between 1,0-1.5 ppm as determined by a reliable test kit. If needed, additional dimples located on opposite sides at the small end of the caltridge may be sliced off to afford

preater deculation.

INSTRUCTIONS FOR USE WITH SCREW TYPE FLOAT RINGS:

Use of this cartridge in vinvi lined pools is not recommended as particles of chloring may fall out and cause discoloration of the vinyl.

Before screwing cartridge into float, use a knife to slice off the first two dimples on either side of the small end of the cartridge, and one additional set of dimples for each 5,000 gallons of pool capacity above 10,000 gallons. Additional may be cut off to allow increased circulation so as to maintain a chlorine residual at all times of between 1.0-1.5 ppm as determined through the use of a reliable test kit. In addition, greater chlorination will occur if the floating cartridge is located in an area of high agitation, such as when it is tied with a piece of fishing line near the inlet of the pool's filtration system Conversely, lesser chlorination may be accomplished by moving the assembly further from the area of high agitation

Cartridge Configuration #5

INSTRUCTIONS FOR USE IN AQUA-GENI TYPE FEEDER:

Chlorination feed rate is regulated by the volume of water passing through the chemical sections and the amount of water flowing through the cartridge.

1. Slice off slot on the end of one row and 1 additional slot on the opposite side end for each 5,000 gallons of pool capacity.

2. Place the cartridge into the feeder and turn until it drops into place. Test water frequently using a reliable test kil to maintain a chlorine residual of between 1.0-1.5 ppm. If chloring level is too high, reduce the flow by dialing a smaller number on the flow dial. If chlorine level is too low, increase the flow by dialing a larger number and/or slice off additional slots on the cartridge.

INSTRUCTIONS FOR USE IN SKIMMER BASKET:

Chlorination feed rate is regulated by the the number of slots cut off of the cartridge and the length of time the filter is in operation.

Start by slicing off 1 slot on the end of one row and 1 additional slot on the opposite end for each 5,000 gallons of pool capacity. Drop cartridge into skimmer.

Test water frequently using a reliable test kit to maintain a chlorine residual of between 1.0-1.5 ppm. If chloring residual is too low, increase dosage by extending filter cycle and/or slicing additional slots off of the cartridge, if chloring residual is too high, decrease desage by decreasing filter cycle and/or covering up open slots with a waterproof tape.

Cartridge Configuration #6

INSTRUCTIONS FOR USE IN BLUE CHLOR TYPE FEEDER:

Continuous chlorination to the pool takes place when the pump is on. Chlorination feed rate is determined by the height of the small pointed standgioe in the chlorinator.

With the pump on, turn the small pointed standpipe in the chlorinator counterclockwise until the water level is highest without unscrewing standpipe out of socket. This maximum water level provides maximum chlorination

Using a sharp pointed instrument, perforate the dimple marked "vent" Remove the child resistant cap from the bottom of the cartridge, leave the

inverted cap underneath in place. Push the cap end into the chlorinator so that the standpipe enters the "x" cut into the inverted cap and cartridge rests on the bottom of the chamber. You are

now chlorinating the pool at maximum rate. follow chlorinator instructions to regulate chlorine level in pool

INSTRUCTIONS FOR USE AS A SELF CONTAINED FLOATING CHLORINATOR: IMPORTANT: Floatation is provided by an air pocket trapped in the Bulb End of this chlorinator. If chlorinator is disturbed and air is displaced by water, the chlorinator will sink and bleaching of painted or vinyl surfaces will result Small particles from Slow Dissolving Tablets may fall out of ouncture notes. As these will bleach vinyl or paint, use of this product in vinyl or painted pools is not recoggnended

Using a sharp instrument, puncture all dimples on both sides of chloriator up to and including those indicating the volume of the pool plus one vent hole.

Place chlorinator in pool. 24 hours later test water with a reliable test kit. If free chlorine residual is below 1.0-1.5 ppm, purificial additional holes if chlorine residual is above 1.5 ppm, seal off the highest set of holes with waterproof tape. Test water frequently and adjust as necessary always to maintain a free chlorine residual of 1.0-1.5 pom.

PLEASE NOTE: The pH of this product is on the acid side and will tend to reduce the pH and alkalinity of the pool water. Proper pH should be maintained at 7.2-7.6 (as determined by a test kit) through periodic additions of socium carbonate or sodium hydrogen carbonate.

Each tablet weighs 14 grams or 0.5 gunces To determine pool capacity, see Pool Calculator below:

POOL GALLON CALCULATOR (all dimensions in feet) Square or Rectangular: Length x Width x Average Depth x 7.5= Gallons

Round or Oval: Length x Width x Average Depth x 5.9= Gallons flame. In case of decomposition isolate container if possible, and flood with large amounts of water. Do not reuse empty container. Rinse empty container thoroughly with water to dissolve all material before discarding. Place in trash

collection or dispose in approved landfill area. E.P.A. REG. NO. 7124-12 E.P.A. EST. NO. 7124-NJ-1 Manufactured for: ALDEN LEEDS, INC. 55 Jacobus Ave., So. Kearny, NJ 07032