

7124-22

03/12/2007

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MAR 12 2007

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

RE: Label Amendment Dated December 12, 2006
Product Name: Nu-Clo Concentrated Chlorinating Granules
EPA Registration Number: 7124-22

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. Your request to add the Directions for Industrial Use site is accepted because the use had been previously on your label. 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,

A handwritten signature in black ink, appearing to read "Emily H. Mitchell".
for Emily H. Mitchell
Product Manager 32

Antimicrobials Division (7510-P)

Enclosure

ACCEPTED
with COMMENTS
In EPA Letter Dated
MAR 12 2007

2/2
nu-clo®

CONCENTRATED CHLORINATING GRANULES

KEEP OUT OF REACH OF CHILDREN
DANGER
SEE FIRST AID STATEMENT AND OTHER PRECAUTIONS
ON BACK PANEL BEFORE OPENING CONTAINER

NET WT. 2 LBS. (.9 kg)

ACTIVE INGREDIENT:
Trichloro-s-Triazinetrione*..... 99.0%
OTHER INGREDIENTS:1.0%
TOTAL:100.0%
* Provides 89% Available Chlorine

- **Contact Algae Killer & Superchlorinator**
Controls algae and bacteria in swimming pools
- 100% soluble • Fast acting - kills algae on floors and walls in hours
- 1 lb. per 15,000 gallons • Controls algae, kills bacteria

- **Excellent for areas of intense sun**
- **For use in pools with a white bottom**
- For daily chlorination of swimming pools**
- 100% soluble • UV stabilized - 24 hour chlorine residual
- 1 ounce per 5,000 gallons daily • ~~Disinfects~~, kills algae and bacteria

This product is the most highly concentrated stabilized cyanuric based disinfectant developed to establish an initial chlorine residual through superchlorination and to maintain proper levels of available chlorine through normal daily maintenance.

This product is easy to dispense and 100% soluble.

DIRECTIONS FOR DAILY USE:

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

INITIAL DOSAGE: When starting up a new pool, superchlorinate to satisfy chlorine demand and to establish an available chlorine residual of 1.0 to 1.5 ppm. Add 1 to 1 1/2 ounces of this product per 1,000 gallons of water. It provides 6.7-10 ppm available chlorine. Test with a reliable chlorine test kit. The next morning add Sandbiter and Stabilizer-Cyanuric acid to stabilize the pool according to the directions on that label. Bathing should not be allowed to enter the pool until the chlorine residual has dropped to 2 ppm or less.

MAINTENANCE DOSE: Add 1/4 to 1/2 ounce per 1,000 gallons per day to maintain a chlorine residual of 1 to 1.5 ppm as determined by a suitable test kit. pH should be maintained in the range of 7.2-7.6.

SHOCK TREATMENT: A shock treatment should be made every week during hot weather or after heavy rains. Less frequent shock treatments may be made during cool weather. Add 1-1 1/2 ounces per 1,000 gallons. Swimmers should not be permitted to enter the pool until chlorine residual has dropped to 3 ppm or less.

Note that daily dosages should vary to compensate for heavy accumulations of dust and dirt caused by storms or heavy bather loads. Additional dosages may be required to maintain a chlorine residual of 1.0-1.5 ppm.

Application should be made using one of the following methods:

SKIMMER METHOD: Use this method to avoid bleaching vinyl liner or paint. Empty skimmer of all chemicals and debris. Make sure that filter is on and that water is properly recirculating through skimmer. Remove any chemicals that may be in an in-line automatic chemical dispensing device. Pour this product slowly into skimmer making sure that the material is drawn into the system at the same rate. Do not allow this material to accumulate as clogs generated may cause an explosion.

DOSE DIRECTLY INTO POOL: Broadcast dosage across surface of water. To prevent liner damage, use skimmer method above.

DIRECTIONS FOR INDUSTRIAL USE:

This product is used to control the growth of bacteria, algae and fungi in recirculating commercial and industrial water cooling towers. Prior to the use of the product in water cooling towers, systems should be cleaned to remove algae growth, bacteriological slime, and other deposits.

When starting with fresh cooling tower water, superchlorinate to satisfy chlorine demand and to establish a chlorine residual of 1.0 ppm to 1.5 ppm available chlorine. Add 1-1/2 oz of these granules per 1,000 gallons which will provide 6.7-10 ppm available chlorine. Test with a reliable chlorine test kit. The next morning add cyanuric acid, according to directions on the label, to stabilize the water.

These granules should be added daily or as needed at the rate of 1/4 to 1/2 oz. per 1,000 gallons of water to maintain a chlorine residual at all times of 1.5 ppm to 3.0 ppm as determined by a suitable test kit. The pH should be maintained between 7.2 and 7.6. Proper dosage should be broadcast over surface of water. Apply dosage directly to cooling tower water. Do not mix in a pail. A shock treatment should be made every week during hot weather or after heavy rains. Less frequent shock treatments may be made during cool weather. For the shock treatment, add 1-1/2 oz. of these granules per 1,000 gallons of water, which will provide 10 ppm available chlorine. Keep in mind that a slight flexibility must be maintained in the event of heavy accumulations of dust and dirt caused by storms or heavy use which require additional dosages as needed to maintain the chlorine residual between 1.0 ppm and 1.5 ppm.

DIRECTIONS FOR USE AS A CONTACT ALGAE KILLER:

THIS PRODUCT WILL BLEACH VINYL OR PAINT: In unpainted concrete pools, this product will amaze you with its speedy action. Shut off filter pump and allow water to settle down. Do not reactivate pump for 6 hours. Sprinkle product along the walls where algae appears and over the surface where algae is seen on pool bottom. It will settle through the water and kill the algae in a matter of hours. Use 1 lb. per 15,000 gallons of water. Sprinkle lightly on scattered patches of algae. Do not use pool until chlorine residual falls below 3 ppm. Test pool water frequently with a reliable chlorine test kit.

STORAGE AND DISPOSAL: Keep product dry in tightly closed container when not in use. Store in a cool, dry, well-ventilated area away from heat or open flame. In case of decomposition isolate container in open area 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.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eye damage and skin burns. May be fatal if absorbed through skin. May be fatal if inhaled. Do not breathe dust or spray mists. Irritating to nose and throat. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield, protective clothing and rubber gloves when handling this product. Wash thoroughly with soap and water after handling and before eating, 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 sip 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.

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.

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.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

ENVIRONMENTAL HAZARDS: This product is toxic to fish. 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.

PHYSICAL AND CHEMICAL HAZARDS: STRONG OXIDIZING AGENT. Mix only with water. 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 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 undissolved state and vinyl liners, painted surfaces or other property in or around the pool will result in permanent bleaching of the color.

nu-clo

Manufactured by **ALDEN LEEDS, INC.**
55 Jacobus Ave., So. Kearny, NJ 07032

EPA REG NO 7124-22 EPA EST NO 7124-NJ-1