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APR 1 1987

Mr. Lawrence Epstein
Alden Leeds, Inc.
55 Jacobus Avenue
South Kearney, NJ 07032

Dear Mr. Epstein:

Subject: Amendments - Updated Formula Statements/Revised Labeling
Nuclio Copper Algaecide
EPA Registration No. 7124-23
Nuclio Liquid Winterizing Agent
EPA Registration No. 7124-28
Pool Brite Winterizer
EPA Registration No. 7124-39
Ortex Concentrated Copper Algaecide
EPA Registration No. 7124-49
Ortex Winterizing Powder
EPA Registration No. 7124-51
Ortex Liquid Winterizer 7
EPA Registration No. 7124-52
Aqua-Trol Premium Shock Treatment
EPA Registration No. 7124-57
Liquid Tru Winterizer
EPA Registration No. 7124-58 ✓
Your Submissions Dated October 28, 1986 and January 15, 1987
EPA Received Date March 19, 1987

The updated formula statements for EPA Registration Nos. 7124-23, -28, -49, -51, -52, -57, and -58 are acceptable and have been included in our files. It is understood that formulas submitted October 28, 1986 replace previously accepted formulas for these products. The formula

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statement for EPA Registration Nos. 7124-38 is not acceptable since figures in column 13.b for the quaternary ammonium compounds (10.08% + 1.92%) do not support labeling:

$$12\% \times 42 = 5.04\% \text{ (n-Alkyl)}$$

$$12\% \times 8 = 0.96\% \text{ (Dialkyl)}$$

If figures in column 13.a are correct, adjust figures in column 13.b accordingly. Please either type or handwrite all information on the formula statement so it is clear which is original information provided by the registrant.

Labeling for EPA Registration Nos. 7124-23, -49, -51, -52, -57, and -58 is acceptable provided you:

1. Make the changes below before releasing the products for shipment bearing the amended labeling:
 - a. For EPA Registration Nos. 7124-23, -49, -52, -57, and -58, add the heading "Precautionary Statements" and the subheading "Hazards to Humans and Domestic Animals." Delete "Corrosive," "Fatal," and the Note to Physician from the Hazards to Humans section.
 - b. Add the statement "May cause skin sensitization in certain individuals" to the Hazards to Humans section.
 - c. Modify Environmental Hazards language as follows:

this pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without previously notifying the sewage treatment authority. For guidance contact your State Water Board or Regional office of the EPA.

2. Submit one (1) copy of final printed labeling incorporating these changes.

A stamped copy of each label is enclosed for your records.

Labeling for EPA Registration Nos. 7124-28 and -39 is not acceptable. Information in our files for products containing quaternary ammonium compounds indicates the correct signal word is "DANGER." Modify precautionary language to include the statement "Causes severe eye and

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skin damage." Use environmental hazards language from i.c. above.
Modify ingredient declarations for EPA Registration No. 7124-28 rounding
to the nearest "tenth" or "hundredth."

Submit five (5) copies of draft labeling for EPA Registration Nos.
7124-28 and -39.

Sincerely yours,

Richard F. Mountfort *RFM*
Product Manager (23)
Fungicide-Herbicide Branch
Registration Division (TS-767C)

Enclosure

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RECEIVED
with comments
APR 1 1987
7124-58

Aqua-trol™

LIQUID TRU WINTERIZER



ACTIVE INGREDIENTS	
COPPER AS ELEMENTAL*	2.51%
INERT INGREDIENTS	97.49%

*From Copper Ethylene diamine tetraacetic acid complex
Equivalent to 242 pounds of copper per gallon
Contains sufficient chelating agent for copper sulfate

KEEP OUT OF REACH OF CHILDREN
CAUTION
SEE FIRST AID STATEMENT AND OTHER
PRECAUTIONS ON SIDE PANEL -
BEFORE OPENING CONTAINER

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Aqua-tral

LIQUID TRU WINTERIZER

CAUTION: Keep out of reach of children. Corrosive, causes eye damage and skin irritation. Do not get in eyes, on skin, or on clothing. Wear goggles, eye shield and rubber gloves when handling. Harmful or fatal if swallowed. Avoid contamination of food.

FIRST AID: In case of contact, immediately flush eyes or skin with plenty of water for at least 15 minutes. For eyes, call a physician. Remove and wash contaminated clothing before reuse. If swallowed, drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol. Call a physician immediately.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression and convulsions may be needed.

NOTE: Liquid Tru Winterizer should not be mixed directly with other pool chemicals. Dangerous reaction may occur.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Keep out of pipes, streams, or ponds. Do not discharge into lakes, streams, ponds or public water. For guidance, contact the regional office of the Environmental Protection Agency.

STORAGE AND DISPOSAL

STORAGE: Keep container closed when not in use. Leaking or damaged containers should be placed in a plastic bag and discarded in trash. Mop up spills with clean water. All pesticides should be kept out of reach of children and stored away from food.

DISPOSAL: Do not reuse empty container. Rinse thoroughly. Securely wrap in several layers of newspaper and discard in trash.

**HELPS KEEP WATER CLEAN
AND ALGAE FREE OVER WINTER
MAKES SPRING START UP EASIER
SAVES WATER-NO NEED TO DRAIN POOL IN SPRING**

DIRECTIONS FOR USE

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

Liquid Tru Winterizer works best when added to a freshly cleaned pool. Liquid Tru Winterizer should be used at the rate of one gallon for every 10,000 gallons of pool water.

Empty skimmer of all chemicals and/or debris. Remove any items that may be in an in-line automatic chemical dispensing device. Make sure that filter is on and that water is properly recirculating through skimmer. Pour Liquid Tru Winterizer slowly into the pool, making sure that the liquid is drawn into the system at the same rate. Keep filter on for 24 hours to assure good distribution.

If equipment has been shut down for season, fill a clean pail with at least 4 gallons of fresh water and strain no more than 1 gallon of Liquid Tru Winterizer. Pour resulting dilution into pool while walking around the perimeter. Repeat until pool is properly dosed.

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

EPA REG NO 7124 58
EPA REG NO 7124 NJ-1

Manufactured by
Alden Leeds, Inc.
55 Jacobs Ave., So. Kearny, N.J. 07032

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