

7364-41

10/19/2010

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

FILE COPY

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

October 19, 2010

Marianne Radtke
Regulatory Affairs manager
GLB Pool & Spa
W175 N11163 Stonewood Dr, Ste 234
Germantown, WI 53022

Subject: Chlorination Tablets
EPA Reg.#: 7364-41
Notification Date: October 2, 2010
Receipt Date: October 8, 2010

Dear Ms. Radtke:

This acknowledges the receipt of your notification, submitted under the provision of PR Notice 98-10 and FIFRA section 3(c)9.

Proposed Notification:

- Deletion of a statement "Causes burns to digestive tract" **under Precautionary Statement;** and
- Addition of a marketing claims "[Sanitizer], [Wrapped Tablets], [Individually wrapped], [Individually wrapped tablets], and [Easy to use wrapped tablets]" on the master text label for "Chlorination Tablets" (EPA Reg# 7364-41).

General Comment:

Based on the review of the material submitted, the notification application for additional marketing claims and the deletion of a statement on the master text label (update 2010-10-4) for "Chlorination Tablets" (EPA Reg# 7364-41) as noted above, are acceptable.

This notification and this letter have been inserted in your file for future reference.

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United States
Environmental Protection Agency
Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 7364-41	2. EPA Product Manager Wanda Henson	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) CHLORINATION TABLETS	PM# 32	
5. Name and Address of Applicant (Include ZIP Code) GLB POOL & SPA W175 N11163 Stonewood Dr. Ste 234 Germantown, WI 53022 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

Amendment - Explain below. Final printed labels in response to Agency letter dated _____

Resubmission in response to Agency letter dated _____ "Me Too" Application.

Notification - Explain below. Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification to add optional marketing claim(s) and remove an inappropriate label statement. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt No. per container

3. Location of Net Contents Information
 Label Container

4. Size(s) Retail Container
4, 8, 15, 25, 50, 90

5. Location of Label Directions

6. Manner in Which Label is Affixed to Product
Screen printed Lithograph Paper glued Stenciled Other _____

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Marianne Radtke	Title Regulatory Affairs Manager	Telephone No. (include Area Code) 262-509-5674
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Certification
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment both under applicable law.

6. Date Application Received (Stamped)

2. Signature <i>Marianne Radtke</i>	3. Title Regulatory Affairs Manager
4. Typed Name Regulatory Affairs Manager	5. Date 10-2 - 2010

GLB Pool & Spa Applied Biochemists
Röbarb Leisure Time
Quantum Aquashade
 Advantis Technologies
 Arch Chemicals Businesses
W175 N11163 Stonewood Drive Suite 234
Marianne Radtke, Regulatory Services
Germantown, WI 53022-4799
262 255-4619 Fax
262 255-4449 ext. 328
E-mail: mradtke@advantistech.com

October 2, 2010

Ms. Wanda Henson
Product Manager 32
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460-0001

Re: **LARGE 3" TABLETS**
 EPA Reg. No. 7364-41

Dear Ms. Henson,

This PR Notice 98-10 notification adds optional marketing claims and inappropriate statement in the Precautionary Statements according to our other approved trichlor labels. This statement was overlooked in our previous submittal and ask that we be allowed to remove it with this notification.

In support of this application for notification, enclosed you will find:

- A completed application (Form 8570-1) for Notification as required by PR 98-10 w/Certification Statement.
- Two (2) copies product labeling with proposed changes in red.

I can be contacted at (262) 509-5674 or by e-mail at mradtke@advantistech.com if you have any questions or require further information.

Sincerely,

GLB POOL & SPA



Marianne Radtke
Regulatory Affairs Manager



MASTER LABEL

[All text in brackets [AAA] is optional and may/may not be included on final label]

{All text in braces {AAA} is for information purposes and will not appear on final label} IN BLUE TEXT

CHLORINATION TABLETS

ACTIVE INGREDIENT: Trichloro-s-Triazinetrione	99%
OTHER INGREDIENTS:	1%
TOTAL:	100%

(Available chlorine 90%)

KEEP OUT OF REACH OF CHILDREN

NOTIFICATION
 Date Reviewed: 10/19/2010
 Reviewed By: W. Hensley

DANGER

Contamination or improper use may cause fire, explosion or the release of toxic gases. Do not allow product to contact any foreign matter, including other water treatment products. If product is exposed to small amounts of water, it can react violently to produce heat and toxic gases and spatter. Do not add water to this product. Add only into water. {Optional – for use on residential use swimming pool products} [Do not remove floater or other dispensing device from water for an extended period of time if it contains a tablet or tablet residue.] {The following optional statement is for use on residential use swimming pool and spa products.} **[Do not mix this product with a small amount of water. Only add directly to your pool.] Corrosive. Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through skin. Harmful if swallowed.**

Read all precautionary statements on back label and first aid statements before use.

[See [side] [back] panel for first aid and precautionary statements.]

FIRST AID:

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.

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

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

IN CASE OF EMERGENCY CALL: 1-800-654-6911

MASTER LABEL

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

DANGER: Corrosive. Causes irreversible eye damage. Causes eye and skin burns. May be fatal if inhaled or absorbed through skin. Harmful if swallowed. Causes burns to digestive tract. Irritating to nose and throat.

- Open in a well-ventilated area. Avoid breathing dust and fumes.
- Do not get in eyes, on skin or on clothing. Wear goggles and rubber gloves. For additional protection of skin, wear long sleeves and long pants.
- Wash hands after handling and before eating, drinking, chewing gum, using tobacco.
- Remove contaminated clothing and wash clothing before reuse.

PHYSICAL AND CHEMICAL HAZARDS:

DANGER. If product is exposed to small amounts of water, it can react violently to produce heat and toxic gas and spatter. Do not add water to this product. Add only into water.

- [Do not mix this product with a small amount of water. Only add this product directly to your pool.] {This statement will appear on Pool use labels only.}
- Do not allow to become wet or damp before use.

Can react with other materials, including other water treatment products, to cause fire, explosion, and the release of toxic gases.

- Keep all foreign matter, including other water treatment products, away from this product.
- Use only clean dry utensils to dispense this product.
- Do not allow this product to contact other water treatment products. If used in a skimmer, make sure skimmer is completely clean and free of residue from other water treatment products before putting this product in a skimmer.
- Avoid spilling this product.

Exposure to heat can cause this product to rapidly decompose, leading to fire, explosion, and the release of toxic gases.

- Store in a cool, dry, well ventilated area away from heat or open flame.

Strong oxidizing agent. This product can increase fire intensity.

- Keep away from heat and from flame and burning material (like a lighted cigarette).

{First sentence of paragraph below for 50 lb. containers or less; complete paragraph for all other sizes}

ENVIRONMENTAL HAZARDS:

This pesticide is toxic to fish and aquatic organisms.

Do not discharge effluent containing this product into lakes, ponds, streams, 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.

STORAGE & DISPOSAL:

{Nonrefillable container - household/residential use}

MASTER LABEL

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

DANGER: Corrosive. Causes irreversible eye damage. Causes eye and skin burns. May be fatal if inhaled or absorbed through skin. Harmful if swallowed. ~~Causes burns to digestive tract.~~ Irritating to nose and throat.

- Open in a well-ventilated area. Avoid breathing dust and fumes.
- Do not get in eyes, on skin or on clothing. Wear goggles and rubber gloves. For additional protection of skin, wear long sleeves and long pants.
- Wash hands after handling and before eating, drinking, chewing gum, using tobacco.
- Remove contaminated clothing and wash clothing before reuse.

PHYSICAL AND CHEMICAL HAZARDS:

DANGER. If product is exposed to small amounts of water, it can react violently to produce heat and toxic gas and spatter. Do not add water to this product. Add only into water.

- [Do not mix this product with a small amount of water. Only add this product directly to your pool.] {This statement will appear on Pool use labels only.}
- Do not allow to become wet or damp before use.

Can react with other materials, including other water treatment products, to cause fire, explosion, and the release of toxic gases.

- Keep all foreign matter, including other water treatment products, away from this product.
- Use only clean dry utensils to dispense this product.
- Do not allow this product to contact other water treatment products. If used in a skimmer, make sure skimmer is completely clean and free of residue from other water treatment products before putting this product in a skimmer.
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- Store in a cool, dry, well ventilated area away from heat or open flame.

Strong oxidizing agent. This product can increase fire intensity.

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{First sentence of paragraph below for 50 lb. containers or less; complete paragraph for all other sizes}

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This pesticide is toxic to fish and aquatic organisms.

Do not discharge effluent containing this product into lakes, ponds, streams, 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.

STORAGE & DISPOSAL:

{Nonrefillable container - household/residential use}

MASTER LABEL

[Keep this product dry in its tightly closed container when not in use. Store in a cool, dry, well-ventilated area. Keep away from heat or open flame. Nonrefillable container. Do not reuse or refill this container. Rinse empty container thoroughly with water to dissolve all material prior to disposal. Offer for recycling if available. Do not contaminate food or feed by storage or disposal or cleaning of equipment.]

{Nonrefillable container – single-use, non-resealable package}

[Keep this product dry in its tightly closed container. Store in a cool, dry, well-ventilated area. Keep away from heat or open flame. Nonrefillable container. Do not reuse or refill this container. Rinse and discard empty container thoroughly with water to dissolve all material prior to disposal. Offer for recycling if available. Do not contaminate food or feed by storage or disposal or cleaning of equipment.]

{Refillable container – household/residential use}

[Keep this product dry in its tightly closed container when not in use. Store in a cool, dry, well-ventilated area. Keep away from heat or open flame. Do not contaminate food or feed by storage or disposal or cleaning of equipment. Refillable container. Do not use this container for any other purpose. Rinse empty container thoroughly with water to dissolve all material prior to disposal.]

{Nonrefillable container - non-household/residential use}

[Keep this product dry in its tightly closed container when not in use. Store in a cool, dry, well-ventilated area. Keep away from heat or open flame. Do not contaminate food or feed by storage or disposal or cleaning of equipment. Nonrefillable container. Do not reuse this container. Offer for recycling if available. Rinse empty container thoroughly with water to dissolve all material prior to disposal.]

{Refillable container – non-household/residential use}

[Keep this product dry in its tightly closed container when not in use. Store in a cool, dry, well-ventilated area. Keep away from heat or open flame. Do not contaminate food or feed by storage or disposal or cleaning of equipment. Refillable container. Do not use this container for any other purpose. Cleaning of this container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. Rinse empty container thoroughly with water to dissolve all material prior to disposal.]

MANUFACTURED FOR:

GLB POOL & SPA

1400 Bluegrass Lakes Parkway

Alpharetta, GA 30004

(Add website) GLBPoolSpa.com (and other brands as needed, i.e. Robarb)

EPA Reg. No. 7364-41

EPA Est No. XXXX-YY-ZZ

NET WEIGHT:

[

MASTER LABEL

DIRECTIONS FOR USE:

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

This product is an extremely concentrated form of a swimming pool sanitizing agent. This product is designed to dissolve slowly and at a uniform rate to eliminate the need of frequent hand-feeding of granular or liquid chlorination.

Reentry into treated swimming pools is prohibited above levels of 4 ppm chlorine.

FOR CONTINUOUS DAILY CHLORINATION:

Before the first use of this product, be sure to take the following steps:

1. Adjust the pool water pH value to between 7.2 and 7.8 as determined by a suitable test kit and adjust the total alkalinity to 80 to 150 ppm (parts per million).
2. Stabilize pool water to at least 30 ppm with [brand] Stabilizer as directed on the container label. Regular use of [*this product*] for daily chlorination will provide any needed makeup stabilizer.
3. Superchlorinate (shock treat) your pool water to reach a 4 ppm residual chlorine reading.
4. Once you complete 1, 2 and 3 above, use this product to maintain the free residual chlorine at a safe and efficient 1.0 – 1.5 ppm at all times as determined by the daily or more frequent use of a suitable test kit.
5. Using a feeder, floater or skimmer dispenser, immerse one tablet (or as many as required to continuously maintain the safe free available chlorine level) for each 5,000 to 10,000 gallons (18,920 to 37,840 liters) of pool water.

NEVER ADD THESE TABLETS DIRECTLY INTO THE SWIMMING POOL AS DISCOLORATION OF THE POOL LINER OR FINISH MAY OCCUR.

6. Superchlorinate or shock treat your pool water at least twice monthly (more often in warmer climates) during hot weather and peak bather loads using [brand shock]. Failure to shock treat regularly can result in the growth of algae in your pool.

MASTER LABEL

Optional – for use on residential use swimming pool and spa products.]



[Stabilized Chlorinating Concentrate in Large 3" Tablets]
[CONTAINS NO CALCIUM]
[STABILIZING CHLORINATING CONCENTRATE]

[Sanitizer]
[Wrapped Tablets]
[Individually wrapped]
Individually wrapped tablets]
[Easy to use wrapped tablets]