

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



Office of Pesticide Programs

MAY 15 2009

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

FILE COPY

Subject: Tabex Chlorination Sticks
EPA Registration No. 7364-51
Application Date: April 22, 2009
Receipt Date: April 27, 2009

Dear Ms. Radtke:

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

Proposed Notification:

- Revisions to Storage and Disposal Statement per PR Notice 2007-4
- Addition of advisory statements
- Addition of optional marketing statements
- Addition of "Responsible Care" symbol

General Comments:

1. The notification application is acceptable and a copy has been inserted in your file for future reference.
2. The First Aid Statement must list the routes of exposure in the following order: "If In Eyes", "If On Skin or Clothing", "If Inhaled", and "If Swallowed".
3. Should you wish to add/retain a reference to the company's website on your label, please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

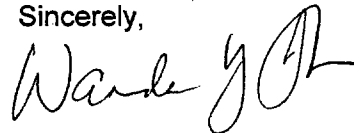
- 2/07
4. In accordance with PR Notice 2007-4, the Agency defines "refillable" as follows:

"Refillable container" means a container that is intended to be filled with pesticide more than once for sale or distribution. The registrant determines whether a container is intended to be refilled for sale or distribution (in which case it is a refillable container) or if it is not intended to be refilled for sale or distribution (in which case it is not a refillable container) and implements its decision by labeling the container appropriately. This decision also would impact packaging design, packaging material, and distribution and marketing plans.

Please consider whether your containers meet our definition of refillable. If it is not your intention for this product to be marketed in containers which are returned to the distributor for refill and resale, then delete the language relevant to refillable containers, within the Storage and Disposal statement. The CSF contains the wrong product name, "GLB Concentrate Chlorinating Granules." The correct product name, "Chlorine Concentrate Granular", must be used on the CSF.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6345.

Sincerely,



Wanda Y. Henson
Product Reviewer (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)

3/9



United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 7364-51	2. EPA Product Manager Emily Mitchell	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) TABEX CHLORINATION STICKS	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

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
 Amendments including ADDITIONAL STATEMENTS AND REVISIONS AS EXPLAINED IN COVER LETTER.
 PR Notice 2007-04 Certification Statement Attached
 Not subject to PRIA

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
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		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 50 LBS		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph Paper glued Stenciled			<input type="checkbox"/> Other Silkscreened		

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) 262 255 4449 ext 328
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 or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Affairs Manager	
4. Typed Name Marianne Radtke	5. Date 4-23-09	

Notification Statements For:

Product: Tabex Chlorination Sticks

EPA Reg. No. 7364-51

Registrant: GLB Pool & Spa

Certification Statement for PR Notice 2007-4

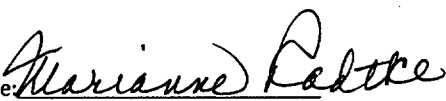
This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR Sections 156.10, 156.140, 156.144, 156.146 and 156.156. No changes have been made to the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR Sections 156.10, 156.140, 156.144, 156.146 and 156.156, 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.

Marianne Radtke

Regulatory Affairs Manager

April 22, 2009

Signature:



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}

Tabex CHLORINATION STICKS
CONTAINS NO CALCIUM

NOTIFICATION
Date Reviewed: 2/15/09
Reviewed By: Elise Berg

STABILIZING CHLORINATING CONCENTRATE

Table with 2 columns: Ingredient Name and Percentage. Includes Active Ingredient (Trichloro-s-Triazinetrione), Other Ingredients, and Total.

(Available chlorine 90%)

KEEP OUT OF REACH OF CHILDREN

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. Harmful if swallowed, inhaled, or absorbed through the skin.

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

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.

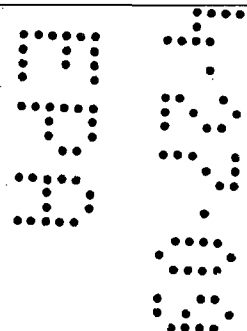
IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF 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.

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. Cause eye and skin burns. May be fatal if inhaled or absorbed through skin. Harmful if swallowed. 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 or using the toilet.
- 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: {Optional statements – usage depends on whether or not refillable or nonrefillable containers are used and whether or not product is packaged for household/residential use only}

{Nonrefillable 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. 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. FOR DISPOSAL OF A CONTAMINATED OR DECOMPOSING PRODUCT SEE "EMERGENCY HANDLING"]

MASTER LABEL

{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. FOR DISPOSAL OF A CONTAMINATED OR DECOMPOSING PRODUCT SEE "EMERGENCY HANDLING."]

{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. FOR DISPOSAL OF A CONTAMINATED OR DECOMPOSING PRODUCT SEE "EMERGENCY HANDLING." 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. FOR DISPOSAL OF A CONTAMINATED OR DECOMPOSING PRODUCT SEE "EMERGENCY HANDLING." 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. FOR DISPOSAL OF A CONTAMINATED OR DECOMPOSING PRODUCT SEE "EMERGENCY HANDLING." 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.]

EMERGENCY HANDLING: In case of contamination or decomposition, do not reseal container. Immediately remove container to an open and well-ventilated outdoor area by itself. Flood with large amounts of water. Dispose of the container and any remaining contaminated material in an approved landfill area.

MANUFACTURED FOR:

GLB POOL & SPA
1400 Bluegrass Lakes Parkway
Alpharetta, GA 30004

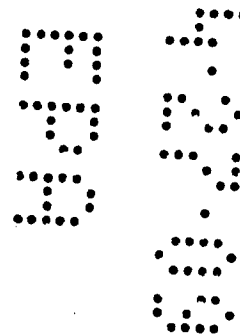
OR

Robarb
Robarb.com

EPA Reg. No. 7364-51
NET WEIGHT:

EPA Est. No. XXXX-YY-ZZ

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



MASTER LABEL



These convenient and easy to use chlorinating sticks from [BRAND] are formulated to protect against chlorine loss in direct sunlight and can be used in floaters, feeders or skimmers. They are designed to dissolve slowly to provide a steady source of available chlorine.

DIRECTIONS FOR USE:

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

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 and total alkalinity to between 80 and 150 ppm as determined by a suitable test kit.
2. Stabilize pool water to at least 30 ppm with [brand] Stabilizer as directed on the container label. Thereafter regular use of this product for daily chlorination will provide any needed makeup stabilizer.
3. Shock treat the pool water with [brand name product] to oxidize organic contaminants. Follow the label directions. Before using the pool, be certain the chlorine level returns to 1-4 ppm.
4. Maintain a free available chlorine level of 1-4 ppm (as determined daily by a suitable test kit) at all times. By means of a feeder, float device, or skimmer dispenser, immerse one CHLORINATION STICK (or as many as may be necessary to maintain the proper chlorine level) for each 5,000 to 10,000 gallons of pool water. NEVER ADD THESE CHLORINATION STICKS DIRECTLY INTO THE SWIMMING POOL AS DISCOLORATION OF THE POOL LINER OR FINISH MAY OCCUR.
5. Shock treat your pool at least twice monthly (more often in sunbelt regions) during hot weather.

