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

October 10, 2012

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Christina Griffin Agent for KIK International, Inc. C/o Delta Analytical Corp., 12510 Prosperity Dr., Suite 160 Silver Spring, MD 20904

Subject: Shock Power EPA Reg.#: 7616-75 Application Date: July 16, 2012 Receipt Date: July 18, 20112

Dear Ms. Griffin:

This acknowledges the receipt of your Amendment application dated July 16, 2012 in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended.

Proposed Amendment:

To update and amend "Shock Power" product label (EPA Reg.#: 7616-75) (letter dated 07/16/2012 and proposed label dated 7/13/12 and pin punch 7/18/12), and also to include the following changes and additions:

Add new company name "KIK Pool Additives, Inc."

- Minor text changes and add graphics.
- Update First Aide, Precautionary and Environmental Hazards statements.
- Update Storage and Disposal statement.
- Make minor dosage changes to Directions for Use.

General Comment:

Based on the review of the materials submitted, the amended label and label and labeling dated 7/13/12 (pin punch 7/18/12), is acceptable.

On page 1 of the current label, it was noted a website addition: www.kem-tek.com. Should you wish to retain a reference to the company's website on your label, then please be aware that such a reference transforms the website into labeling under the Federal Insecticide Fungicide and Rodenticide Act sec 2 (p) (2) and then the website is subject to review by the Agency. If the website content is false or misleading, the product would be misbranded and its sale or distribution unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 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. Although EPA has not yet determined the extent to which it will routinely review company websites, if the Agency finds or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from claims approved through the registration process, the website may be referred to the EPA's Office of Enforcement and Compliance Assurance.

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

If you have further question on this letter, please contact David Liem by email at <u>liem.david@epa.gov</u> or call at 703-305-1284.

Sincerely

Monisha Harris Product Manager (32) Regulatory Management Branch II Antimicrobial Division (7510P)

Encl: Stamped Accepted with comments label

Shock Power

Previously approved Alternate Brand Names: Aqua Guard Shock Quick Kem Tek Shock Quick Paddock Shock Power Pro Side Shock Quick ACCEPTED with COMMENTS in EPA Letter Dated:

OCT 1 0 2012

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the posticide, registered under EPA Reg. No.

7616-75

Active Ingredient:	
Trichloro-s-triazinetrione	40.0%
Other Ingredients	60.0%
Total	100.0%
(36.0% available chlorine or Available Chlorine -	36.0%)

KEEP OUT OF REACH OF CHILDREN DANGER

SEE BACK PANEL FOR FIRST AID STATEMENT AND OTHER PRECAUTIONS [or SEE FIRST AID STATEMENT AND ADDITIONAL PRECAUTIONS ON BACK PANEL]

> Net Wt. _____ (g [or kg])

[The following may appear in any appropriate place on the label:]

Manufactured by [for]: KIK Pool Additives, Inc. 5160 E. Airport Dr. Ontario, Calif. 91761

[Optional: Following may be included in addition to "Manufactured by [for]" address above: Distributed by [or Sold by] [or Marketed by] Insert additional company name and address]

EPA Reg. No. 7616-75 EPA Est. No. 7616-CA-1

[Free Pool Care Advice 1-800-SOS-POOL • www.kem-tek.com]

FIRST AID: Call a poison control center [(1-800-222-1222)] or doctor for treatment advice. Have the product container or label with you when calling poison control center or doctor, or going for treatment. 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. 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. If swallowed: Have person sip a glass of water if able to swallow. DO NOT induce vomiting unless told to do so by present 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.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage. *, [First Aid may be in table form]

[In the text "this product" or alternate brand name may be substituted for Shock Power name] [[Information in brackets[] is optional or instructional; italics in brackets indicate instructions not part of labeling.] Ashared/KIK Pool Additives/7616-75/label/2012/7616-75 amend label clean 071312.doc 7/13/12 Page 1 of 7

Hazards to Humans and Domestic Animals

Danger: CORROSIVE: Causes irreversible eye damage and skin burns. May be fatal if absorbed through the skin. May be fatal if inhaled. Do not breathe dust or spray mist. 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, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash clothing before reuse.

[For containers smaller than 50 pounds use the following:]

Environmental Hazards

This product is toxic to fish and aquatic organisms.

[In accordance with PR notice 95-1, use the following complete Environmental Hazards statement for containers 50 pounds and larger]

Environmental Hazards

This product is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public 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 or Chemical Hazard

STRONG OXIDIZING AGENT. WILL BURN WITH THE EVOLUTION OF CHLORINE AND EQUALLY TOXIC GASES. CONTACT WITH WATER SLOWLY LIBERATES IRRITATING AND HAZARDOUS CHLORINE CONTAINING GASES. DECOMPOSES AT 460° F TO 480° F WITH THE LIBERATION OF HARMFUL GASES.

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 the generation of heat, liberation of hazardous gases and possible generation of fire or explosion.

IN CASE OF FIRE, if possible, isolate container in open air or well-ventilated area. Flood with a large volume of water. [IN CASE OF] CONTAMINATION [OR DECOMPOSITION:] do not reseal container.

[In the text "this product" or alternate brand name may be substituted for Shock Power name] [[Information in brackets[] is optional or instructional; italics in brackets indicate instructions not part of labeling.] f\shared\KIK Pool Additives\7616-75\label\2012\7616-75 amend label clean 071312.doc 7/13/12 Page 2 of 7 [Optional Label Claims/location optional:] [Claims may be in upper or lower case] ABC Smart[er] [Pool Care] [System] Add Directly to [Skimmer] [or] [Pool] Add [Dry Product] Through Skimmer or Directly To Pool Buffered Sanitizer Shock Treatment For Crystal Clear Water Built In Clarifier С Can Be Broadcast Over Pool Can Be Used In Salt Pools Clarifies By Removing Organic Matter and Swimmer Waste* **Clarifies Water Clears Cloudy Water Compatible With Salt Pools** Contains 5 [1 lb.] [Convenient Pre-Measured] Pouches **Contains A Filter Enhancer** Contains No Calcium [or Calcium Free] [info for customer who needs a calcium free product for pool] Controls Algae [[&] [And]] Bacteria* [location optional:] *During Super Chlorination Controls Algae [Sanitizes Pool Water] **Convenient Skimmer Application** Destroys [Organic] [Swimmer] [Contaminants] [Wastes] Dissolves [Completely] [Instantly] [Quickly] [NOTE: Do not allow direct contact of this product on the following pool surfaces: vinyl, metallic, fiberglass, painted or colored plaster. Always dilute in the water; direct contact with surfaces will bleach color out.] Do Not Mix This Product With Any Other Product Do Not Pre-Dissolve Easy Skimmer Application **Enhances Filtration** Fast [Acting] [Dissolving] [Dissolving Shock] [Sanitizer] Fast Dissolving Tri-Chlor Shock For Swimming Pools For All Pool[s] [Surfaces] [Including Vinyl, Plaster [[&] [And]] Fiberglass] For [Daily] [Everyday] Chlorination [[&] [And] [or]] Shock For Heavy Bather Loads or After Heavy Rains For Pool Startup [[&] [And]] Weekly Shock Treatment For Shocking [[&] [And]] Everyday [Or Daily] Chlorination For Super-chlorination [or Super Chlorination] For Use As A Shock For Use With All Pool Surfaces Gathers Debris For Easy [Filtration] [Removal] Good For All Pool Surfaces Helps Maintain Balanced pH Ideal for Use After Heavy Rains Ideal For Vinyl Pools Improves Filter Performance Keeps Water [Clean] [Crystal Clear] Kills [Algae] [[&] [And] [or]] [Bacteria] [Instantly] [Rapidly] No Need To Pre-Dissolve One Bag Treats [up to] 15,000 Gallons [change # gallons according to size of package] Oxidizer Part C Part Of The Kem Tek Pool Care System Part Of The Simply Smart[er] [Pool] [Care] [System] Patented [Chlorine] [Formula] [Technology] ph Balanced Pools, Patios [[&] [And]] Spas Quality [[&] [And]] Satisfaction Guaranteed Or Your Money Back

[In the text "this product" or alternate brand name may be substituted for Shock Power_name] [[Information in brackets[] is optional or instructional; italics in brackets indicate instructions not part of labeling.] Ashared\KIK Pool Additives\7616-75\label\2012\7616-75 amend label clean 071312.doc 7/13/12 Page 3 of 7

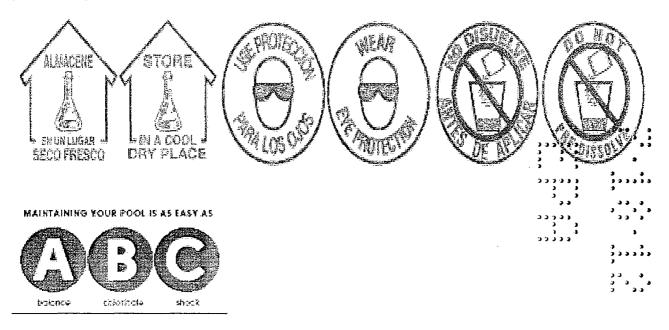
Quick [Chlorine Boost] Quick [Dissolving] [Formula] [Shock Treatment] **Quick Sanitizer Reduces Chemical Needs** Reduces Chlorine Odor [[&] [And] [or]] Eye Irritation Removes Organic [Contaminants] [Waste [[&] [And]] [Produces Sparkling Swimming Pool Water] Restores A Crystal Clarity To Pool Water **Routine Maintenance Chlorinator** Shock Shock Treatment [[&] [And]] Super Chlorinator For Swimming Pools [[&] [And]] Spas Patented Technology Step [Insert #] Swim [After Use] [In 15 Minutes] [In Just 15 Minutes After Use] Swimming Pool Water Disinfectant The Professional Side Of Pool Care Shocks Water Clear [Simply C] [Smart[er] C] [Step C] Simply Smart[er] [Pool Care] [System] Stabilized Suitable For [Closing Pools] [Opening Pools] [Pool Closing] [Pool Winterization][Use In All Pools] Treats XX,XXX Gallons Of Water ** [size [[&] [And]] [size determines what X is] Use For [Closing Pool] [Opening Pool] Use Weekly^[*] [[⁺]Treats XX,XXX Gallons Of Water Weekly^{**} [size of package determines what X is] **UV** Protected Works Immediately

*During Super Chlorination

Step #1	Step #2	Step #3	Step #4	Step #5
Balance	Chlorinate	Shock	Algae Care	Clarify

[The following wording can be used depending on size of package:] For 11 oz package:TREATS [up to] 10,000 GALLONS**! For 1 lb package: TREATS [up to] 15,000 GALLONS **!

[GRAPHICS]



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[Optional Label Claims/location optional:]

SHOCK TREATMENT

Shocking / Super Chlorinating Your Pool Water

Consider shocking the pool when:

- An increased number of swimmers are using the pool.
- Chloramines are present in the water and the chlorine is not effectively working.
- The water is cloudy even though a proper chlorine level is maintained.

Shocking must be done periodically to remove waste materials like suntan oils, perspiration, body oils and other organic waste.

SHOCK SCHEDULE

Summer – Once per week Spring – Twice per month Fall – Twice per month Winter – Once per month

SHOCK POWER Features & Benefits:

Patented Formula / Dissolves Quickly / Controls Algae and Bacteria*

The best time to shock is early evenings with the pool circulating system in operation. This way the sun will not reduce the effectiveness of the treatment.

The SHOCK POWER Advantages:

[This patented blend of ingredients] [or SHOCK POWER] [or This product] works fast allowing swimmers back into the pool in just 15 minutes. This is a premium grade shock product, so it takes only 1 lb of SHOCK POWER to treat 12,000 to 15,000 gallons of pool water weekly. [change amount of product and pool size in accordance with package size]

SHOCK POWER can be added directly into the water without pre-dissolving and it is ideal for all types of swimming pools. It destroys swimmer wastes and other impurities that cause cloudy water. SHOCK POWER dissolves faster than ordinary shock products without leaving residue. It does not increase the pH of the pool water or contain calcium that causes scale build-up.

DO NOT PRE-DISSOLVE [IN CONTAINER (ie. bucket)] BEFORE APPLYING.

[READ ALL PRECAUTIONARY STATEMENTS BEFORE USE]



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DIRECTIONS FOR USE

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

[START UP: Step 1. Condition pool water with cyanuric acid (KEM TEK STABILIZER - CONDITIONER) as per directions on the label. Thereafter, regular use of SHOCK POWER alone will maintain proper stabilization. NOTE: Omit Step 1 if pool is already conditioned with similar stabilizer. Step 2. Concurrently with Step 1, initially treat water by adding 1 ½ lb of SHOCK POWER per 10,000 gallons of pool water.]

DAILY USE: [After steps 1 and 2.] Regularly check chlorine residual with a test kit and chlorinate daily or as needed to maintain 1.0 to 1.5 ppm residual chlorine. NOTE: Two ounces of this compound per 5,000 gallons of pool water will increase an existing chlorine level by 1.0 ppm (1/8 rounded measuring cup=1 oz.).

The following tables are a handy reference for average chlorine requirements, but must not be substituted for regular use of a test kit since pools and conditions vary considerably. Test water frequently and chlorinate as needed. Anticipate an increased chlorine consumption with increased swimming, hot water or weather, rain, a dirty or neglected pool, etc.

TYPICAL DAILY DOSAGE (SUMMERTIME) [After Steps 1 & 2 above]

ABOVE GROUND POOL - 3' to 4' Deep				IN GROUND POOL - 7' to 9' DEEP							
Pool Diameter	12 Ft.	15 Ft.	18 Ft.	20 Ft.	24 Ft.	Pool Size Feet	14x28	16x32	17x34	18x36	20x40
Approx. Gallons	2,500	4,500	7,000	9,000	13,000	Approx. Gallons	15,000	20,000	25,000	30,000	35,000
Dosage Ounces	1	2	3	4	5	Dosage Ounces	6	8	10	12	14

**WEEKLY USE

- 1. 1. Check the pH of the pool water daily, adding sodium bisulfate [(may insert product name)] or soda ash [(may insert product name)] or equivalent products as necessary to maintain pH in the 7.2 – 7.6 range.
- 2. SHOCK POWER is made up of fine particles that dissolve almost instantly when applied to water. Use the entire bag for each application (if applicable). Pour a steady stream of SHOCK POWER into the deep end of the pool. Pour near the water surface (particularly if the wind is present while applying) to ensure the entire dose enters the water.
- 3. Operate the pump system 4-8 hours (minimum) after applying SHOCK POWER.
- Use one pound of SHOCK POWER to treat 12,000 –15,000 gallons of pool water every week or more often 4. if necessary. [change amount of product and pool size in accordance with package size]

[The use of SHOCK POWER also requires the one time use of cyanuric acid (KEM TEK STABILIZER -CONDITIONER) as described in the Start Up directions. This two-compound system results in a longer-lasting chlorine residual and reduced chlorine consumption. Both products are completely soluble.] 3 3 3 3 3 3 3 3 3 3

SUPER CHLORINATION:

Whenever the pool water loses its sparkle, turns green or the chlorine residual falls rapidly after regular chlorination, super chlorinate the pool. During the summer months, super chlorinate pool with 1 1/2 lb. per 10,000 gallons of pool water every 10 to 14 days. Do not use the pool until the chlorine residual has dropped to 3 pam

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GENERAL POOL CARE

HEAVY BATHER LOAD: At the start of the swimming season, in filled pools, upon filling a pool, and after heavy swimmer load, super chlorination (shocking) is necessary. The addition of two or three times the normal amount of SHOCK POWER oxidizes and removes unwanted organic material. Do not use pool during super chlorination until the chlorine residual is less than 3 ppm. The end result is the establishment of a chlorine residual 1.0 – 1.5 ppm.

VINYL LINED POOL CARE: Vinyl lined are easily damaged by chemicals used to treat and maintain pools. SHOCK POWER is well suited for use in these pools, especially the above ground type which have only 3-4 foot depths and are not equipped with a bottom drain. SHOCK POWER dissolves rapidly and completely, so direct contact with liner is reduced and there are not residues to be sweep or vacuumed from the bottom. SHOCK POWER is not sensitive to the pH of the water and will not cloud the water even when shocking or super chlorinating as often occurs with calcium hypochlorite.

GENERAL SPA CARE

- 1. SPA START UP: Before bathing, test pH, chlorine residual and
- alkalinity using a suitable test kit. Adjust chlorine residual to 3.0 ppm. After bathing, super chlorinate to 5.0 ppm (1½ tablespoons per 500 gallons of water). Maintain pH water between 7.2 and 7.6 with soda ash [(may insert product name)] and sodium bisulfate, muriatic acid, or sulfuric acid [(may insert product name)] and total alkalinity between 125 and 175 ppm using sodium bicarbonate [(may insert product name)]
- 3. One tenth oz. (½ tsp.) per 250 gallons of water yields 1.0 ppm and 1 level tbsp. Yields 6.0 ppm of chlorine. To use, broadcast granules into water with the jets running. Bathing can start at once.
- 4. With 4 bathers in a 500 gallon spa a 2.0 ppm chlorine residual can drop below the minimum 1.0 ppm in 15 to 20 minutes. Less water or more bathers will accelerate loss. Test often and keep chlorine residual above 1.0 ppm.
- 5. Weekly, super chlorinate water to 5 or 6 ppm (see 2 above). Re-entry into spas is prohibited above levels of 3 ppm of chlorine. Drain and clean spa whenever the water becomes difficult to manage. Avoid use of products such as body lotion that can consume chlorine.

STORAGE AND DISPOSAL

STORAGE: Keep product 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. CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. IF EMPTY: Place in trash [collection] or offer for recycling if available. IF PARTLY FILLED: Call your local solid waste agency for disposal instruction. Never place unused product down any indoor or outdoor drain.



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