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MAY 10 1994

Kathy Tannis
A & V Inc.
N62 W22632 Village Drive
Sussex, WI 53089

Subject: Poolcare Lithium
EPA Registration No. 12014-31
Your Amendment Dated October 21, 1993

Dear Ms. Tannis:

This is in response to your amended labeling for revision of Storage and Disposal and Precautionary Statements sections.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. A stamped copy is enclosed for your records.

- 1. Replace the text under the Environmental Hazards heading with:

This pesticide is toxic to fish and aquatic organisms. 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.

- 2. Submit five copies of the finished labeling before the product is released for shipment bearing the amended labeling.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

2076

If you have any questions about these comments, please call
Wallace Powell at 703-305-6938.

Sincerely,



Ruth G. Douglas
Product Manager 32
Antimicrobial Program Branch
Registration Division (7505C)

Enclosure

2076

POOLCARE LITHIUM

ACTIVE INGREDIENTS

Lithium Hypochlorite.....	29%
Inert Ingredients.....	71%
Total	100%

Contains 35% Available Chlorine

KEEP OUT OF REACH OF CHILDREN
DANGER

See side panel for additional precautions.

EPA Reg. No. 12014-31
EPA Est. Reg. No. 12014-WI-1

Manufactured by
A&V INCORPORATED
N62 W22632 VILLAGE DR
SUSSEX WI 53089

ACCEPTED
with COMMENTS
in EPA Letter Dated:

MAY 10 1994

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

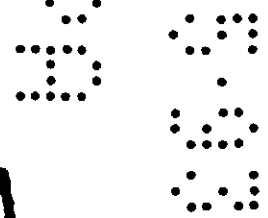
12014-31

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER

Highly corrosive. Causes skin and eye damage. May be fatal if swallowed. Do not get in eyes, on skin or on clothing. Wear goggles or face shield and rubber gloves when handling. Irritating to nose and throat. Remove and wash contaminated clothing before reuse.

PHYSICAL AND CHEMICAL HAZARDS
STRONG OXIDIZING AGENT

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 gases, and possible generation of fire and explosion. In case of contamination or decomposition, do not reseal container. If possible, isolate container in open air or well ventilated area. Flood with large volumes of water, if necessary.



BEST AVAILABLE COPY

PRACTICAL TREATMENT (FIRST AID)

IF SWALLOWED: Drink two glasses of water and see a physician immediately. DO NOT INDUCE VOMITING.

IF ON SKIN: Wash skin thoroughly with cold water for at least 15 minutes. If irritation persists, see a physician.

IF IN EYES: Flush with cold water for at least 15 minutes. Get medical attention.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge into lakes, streams, ponds, or public waters unless in accordance with an NPDES Permit. For guidance, contact the regional office of the EPA.

STORAGE AND DISPOSAL

Store in a cool, dry place. Do not transfer into unlabeled containers. Close container tightly after each use. Protect from moisture and heat. Completely empty container, triple rinse or (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. Do not contaminate water, food or feed by storage or disposal.

DIRECTIONS FOR USE AS A SANITIZER

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

To start your pool:

- 1). Backwash filter.
- 2). Utilizing your pool test kit, adjust pH of pool water to 7.2 - 7.6. Add soda ash or sodium bicarbonate to correct an acid condition (less than 7.2). Add sodium bisulfate if the pH is greater than 7.6. Maintain pH range of 7.2 - 7.6 for a minimum of 6 hours before the addition of this product and during the entire season.
- 3). Use two cups of this product per 5,000 gallons of water.

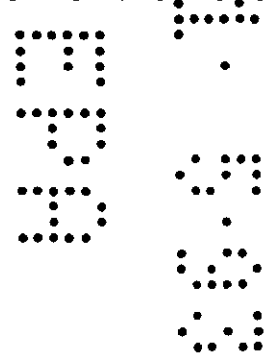
After the proper pH range (7.2 - 7.6) and chlorine residuals (1.0 - 1.5) have been established, it is beneficial to add cyanuric acid to the pool to prevent extreme fluctuations in the chlorine level. Follow label instructions.

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Under the Federal Insecticide,
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5076

HOW TO MAINTAIN THE PROPER CHLORINE RESIDUAL

The chlorine residual should be maintained between 1.0 - 1.5 ppm available chlorine as determined by the chlorine test kit. Under normal conditions, this residual can be maintained by the daily addition of about 1/3 cups (2.7 ounces) of this product for each 5,000 gallons of pool water - if the pool water is properly stabilized with 30 - 50 ppm of cyanuric acid. Severe conditions, such as high temperature or continued use by many people, will require higher daily dosage, whereas smaller doses may suffice in spring and fall, or when the pool is not being subjected to normal bathing loads.

The pool water should be superchlorinated about once each week. Five times the normal daily addition, or a minimum of one cup (eight ounces) per 5,000 gallons of pool water should be added in the evening when the pool will not be used for a minimum of 12 hours. Test the chlorine residual and if above 2.0 ppm, do not allow swimming until residual has decreased.

DIRECTIONS FOR USE AS SHOCK

The pool water should be shock treated about once each week. Utilizing your pool test kit, adjust pH of pool to 7.2 - 7.6. Use one pound (1lb.) per 6,000 gallons of water in the evening when the pool will not be used for a minimum of 12 hours. Test the chlorine residual and if above 2.0 ppm, do not allow swimming until residual has decreased.

DIRECTIONS FOR USE AS A SPA SHOCK

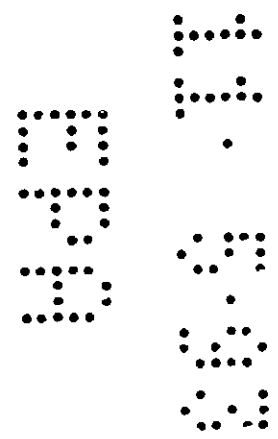
Lithium Spa Shock is compatible with all spa sanitizers, but always add spa chemicals separately. Use a reliable test kit with fresh solutions for pH and chlorine testing. Add Lithium Spa Shock daily when water appears dingy or hazy from bather contamination. Turn off the air blower and circulation system. Sprinkle Lithium Spa Shock into water at the rate of one ounce per 250 gallons. The granules will dissolve completely within seconds and liberate 10 ppm of available chlorine. Allow the ensuing reaction to proceed 10-15 minutes before covering the spa. Turn on the circulation system. Bathers should not re-enter the spa until the available chlorine residual falls to 3.0 ppm.

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6076

DIRECTIONS FOR USE
AS A SPA SANITIZER

Use one-quarter ounce of Lithium Chlorinating Granules per 250 gallons of water as an initial treatment. Repeat procedure until a residual of 2.0 to 3.0 ppm is established. Frequent testing to determine additional doses needed to maintain proper residual is highly recommended. Use a reliable test kit with fresh solutions for pH and chlorine testing.

If needed superchlorination arises, use one-half ounce of Lithium Chlorinating Granules per 250 gallons of water. Bathers should not enter the spa until the available chlorine residual falls to 3.0 ppm.

Before using the spa, shower in order to avoid adding soap, lotions or oils from the body into the water. Do not add food or beverages to the water. Avoid overloading the spa.

If the spa is used daily, it should be drained completely and fresh-filled about once a month.

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