46043-11

5/28/2009

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

EPA United States Environmental Protection Office of Pesticide Programs

MAY 28 2009

Kathy Kollen EPA Coordinator Suncoast Chemicals Company 14480 62nd Street North Clearwater, Florida 33760

FILE COPY

Subject: Suncoast Stabilized Granular Chlorinator EPA Registration No. 46043-11 Application Date: April 15, 2009 Receipt Date: April 20, 2009

Dear Ms. Kollen:

The following amendments, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are acceptable with the comment below:

- Revision to Storage and Disposal Statement per PR Notice 2007-4
- Reformat of master label
- Revision of "1-3 ppm" FAC to "2-4 ppm"
- Addition of marketing claims
- Revision of typo: "Addition" to "Application"

Comment:

- 1. The word "ideal" is considered a comparative claim, and is not acceptable. You must remove the following claims from the label: "Ideal for use in vinyl-lined pools", "Ideal for use in fiberglass pools", "Ideal for use in fiberglass and vinyl-lined pools."
- 2. The First Aid Statement must be revised so that the routes of exposure are listed in the following order: "IF IN EYES", "IF INHALED", "IF ON SKIN OR CLOTHING", "IF SWALLOWED".
- 3. You must add the following statement to the Precautionary Statements, "Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco."
- 4. You must revise the Ingredient Statement phrase "Inert Ingredients" to read "Other Ingredients".

General Comments:

A stamped copy of the labeling, accepted with conditions, is enclosed. Submit one copy of your final printed label before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Wanda Henson at 703-308-6345.

Sincerely. ande Mr

Emily H. Mitche Product Manager (32) Regulatory Management Branch II Antimicrobials Division (7510P)

SUNCOAST® CHEMICALS CO. STABILIZED GRANULAR CHLORINATOR

Active Ingredient:

Sodium Dichloro-S-Triazinetrione Dihydrate	
Inert Ingredients:	1%
TOTAL	

Available Chlorine......55.5%

KEEP OUT OF REACH OF CHILDREN DANGER

See [First Aid and] Additional Precautions on back panel.

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FIRST AID	
IF SWALLOWED:	Call 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 ON SKIN:	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. Call a poison control center or
	doctor for further treatment advice.
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.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center	
or doctor, or going for treatment. You may also contact 1-800-255-3924 for	
emergency treatment information.	
NOTE TO PHYSICIAN:	
Probable mucosal damage may contraindicate the use of gastric lavage.	

DIRECTIONS FOR USE:

It is a violation of federal law to use this product in a manner inconsistent with its labeling. This product is designed to dissolve quickly and completely providing a steady source of available chlorine in swimming pools to control the growth of algae, kill bacteria and destroy organic contaminants.

READ THE PRECAUTIONARY STATEMENTS BEFORE USE:

METHOD OF APPLICATION: Broadcast the product evenly over a wide area in the deepest part of the pool with water circulating.

ROUTINE CHLORINATION: Throughout the pool season, adjust pH to 7.2-7.6 with [Suncoast pH Plus] or [Suncoast pH Minus] {insert brand names}. Follow label directions. Broadcast 3 oz. of this product per

10,000 gallons pool water every other day or as often as needed to maintain chlorine residual at 2-4 ppm. This quantity may vary depending on bather load, temperature and other conditions. Re-entry into treated pools is prohibited above levels of 3 ppm chlorine. As a preventative treatment, you should shock treat weekly to prevent pool problems which may occur when bathing loads are high, water appears hazy or dull, unpleasant odors or eye irritation occur, after heavy wind and rain storms, when temperatures are high, in case of colored water, or if algae develops with resulting green color and slimy feeling.

SHOCK TREATMENT: Adjust pH to 7.2 to 7.4 with [Suncoast pH Plus] or [Suncoast pH Minus] {insert brand names}. Follow label directions. Shock treat weekly to kill bacteria, control algae and organic material. As an alternative, add 18 oz. of this product per 10,000 gallons of pool water.

ALGAE CONTROL: If the sides or bottom develop algae spots, follow shock treatment directions above. Immediately after treatment, thoroughly clean pool by scrubbing surfaces of algae growth, vacuum and cycle through filter. If necessary, repeat the treatment. Reentry into treated pool is prohibited above levels of 3 ppm chlorine.

OPENING YOUR POOL: Adjust pH to 7.2 to 7.6 with [Suncoast pH Plus] or [Suncoast pH Minus] {insert brand names}. Follow label directions. Shock treat following directions above. The next day, stabilize your pool. Follow label directions. As an alternative, three shock treatment dosages with this product will raise your stabilizer level by approximately 20 ppm, which is the normal starting level of stabilizer.

WINTERIZING: While the water is still clear and clean, prepare for long periods of disuse by gradually adding 36 ounces of this product per 10,000 gallons of water (to provide a dosage of 15 ppm free available chlorine). Follow Method of Application above. Run pump and filter until completely dispersed. Cover the pool with a plastic pool cover and prepare the heater, pump and filter components for winterizing by following manufacturer's directions.

WATER BALANCE: To provide optimum product performance, swimmer comfort and crystal clear water. alwavs maintain pH in the 7.2-7.8 range, total alkalinity in the 90-125 parts per million (ppm) range and calcium hardness above 200 ppm. Use a reliable test kit that measures all these ranges. Make necessary adjustments with the appropriate [Suncoast] pool care products.

To determine your pool's capacity in U.S. gallons, use the appropriate formula below: Use measurements in feet only.

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RECTANGULAR: Length X Width X Average Depth X 7.5 = TOTAL GALLONS

 ROUND: Diameter X Diameter X Average Depth X 5.9 = 101AL GALLONS

 OVAL: Maximum Length X Maximum Width X Average Depth X 5.9 = TOTAL GALLONS

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ROUND: Diameter X Diameter X Average Depth X 5.9 = TOTAL GALLONS FREEFORM: Surface area (sq. ft.) X Average Depth X 7.5 = TOTAL GALLONS]

SPA AND HOT TUB USE: Each level teaspoon (0.17 ounces) of this product will provide approximately 1.4 ppm available chlorine in 500 gallons of water. Using an appropriate test kit, test and adjust the water to the following values: pH 7.2-7.8, total alkalinity 60-100 ppm, calcium hardness 200 ppm minimum. Maintain these conditions for proper spa and hot tub operation by frequent testing with a test kit. Do not allow cyanuric acid level to exceed 150 ppm. It is recommended that spas and hot tubs be drained every 30-90 days. More often under heavy use. Consult manufacturer's recommendations concerning the compatibility of chlorine sanitizers with their equipment. Some oils, lotions, fragrances and cleaners may cause foaming or cloudy water and may react with chlorine sanitizers to reduce their efficiency. START-UP (FRESHLY FILLED)

1. Turn on the circulation system and ensure that it is working properly.

2. Add 6 teaspoons of this product for each 500 gallons of water.

Check the free available chlorine (FAC) and, if below 4-5 ppm, repeat as needed. Re-entry into treated spas is prohibited above levels of 3 ppm or chlorine.

REGULAR USE: Turn on the circulation system and ensure that it is operating properly. Scatter approximately 3 teaspoons per 500 gallons of this product over the surface of water. Always use a clean dry spoon. Test for FAC and add additional product, if necessary, to attain 4-5 ppm FAC. Maintain 1-3

ppm FAC while the spa or hot tub is in use. After each use, shock treat with 9 teaspoons per 500 gallons water to control odors and algae. Repeat as needed. Reentry into treated spas is prohibited above levels of 3 ppm of chlorine.

EMERGENCY HANDLING: In case of contamination or decomposition do not reseal container. If possible, isolate container in open and well-ventilated area. Flood with large volumes of water. Dispose of contaminated material in an approved landfill area.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER. Corrosive. Causes irreversible eye damage. May be fatal if inhaled. Harmful if swallowed or absorbed through skin. Do not get in eyes, on skin, or on clothing. Do not breathe dust, vapor or spray mist. Wear goggles, face shield or safety glasses. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.

CHEMICAL HAZARDS:

DANGER: Strong oxidizing agent. Use only clean, dry utensils. Mix only with water. Contamination with moisture, dirt, organic matter, or other chemicals (including other pool chemicals), or any other foreign matter may start a chemical reaction with generation of heat, liberation of hazardous gases, and possible generation of fire and explosion. Avoid any contact with flaming or burning material, such as a lighted cigarette. Do not use this product in any chlorinating device which has been used with any inorganic or unstabilized chlorinating compounds (e.g. calcium hypochlorite). Such use may cause fire or explosion.

ENVIRONMENTAL HAZARD

{For 50 pounds and less:} [This pesticide is toxic to fish and aquatic organisms.]

{For larger than 50 pounds:} [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 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 EPA.]

STORAGE AND DISPOSAL:

STORAGE: Keep product dry in a tightly closed container when not in use. Store in a cool, dry, wellventilated area away from heat or open flames. Do not reuse or refill empty container. DISPOSAL:

If empty: Nonrefillable container. Do not reuse or refill this container. Place in trash or offer for recycling, if available.

If partly filled: Call your local solid waste agency or 1-800-CLEANUP (800-253-2687) for disposal instructions. Never place unused product down any indoor or outdoor drain.

{Marketing Claims}

[Protects against odor] [Controls bacteria and algae] [Fast dissolving] [Sanitizer] [Sanitizes pool water] [Stabilized Chlorinator] [Stabilizer] [Controls algae] [Kills bacteria and destroys organic contaminants] [Kills algae] ALENER CONTRACTOR ALENER CONTRACTOR ALENER CONTRACTOR CONTRACTOR CONTRACTOR

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{Marketing Claims For Spas Only:}

[Maintains crystal clarity in spa and hot tub water] [Sanitizes and disinfects spa water] [Dissolves quickly with no residue] [Sanitizer for Spas]

EPA REG. 46043-11 EPA Est. No. 46043-FL-1

IN CASE OF EMERGENCY CALL 1-800-255-3924

Manufactured By: **SUNCOAST CHEMICALS COMPANY** 14480 62nd Street N. Clearwater, FL 33760

ACCEPTED with COMMENTS in EPA Letter Dated:

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MART 8 200 Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Rog. No. 46043-11