

48520-10

11/5/2012

1/10



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 5, 2012

Ms. Marianne Radtke, Regulatory Agent
Regulatory Services
5010 South 20th Street
Milwaukee, WI 53221
mcrreg1@ameritech.net

Subject: Notification per PR Notice 98-10
Product Name: **Phoenix Giant Tabs**
EPA Registration Number: **48520-10**
Application Date: October 23, 2012
Application Receipt Date: October 31, 2012

Dear Ms. Radtke:

This acknowledges receipt of the Notification application identified above, submitted under the provision of FIFRA 3(c) 9 and PR Notice 98-10.

Proposed Notification:

Phoenix Products Company is adding the following **Alternate Brand Names** to **EPA Reg. No. 48520-10**: 1.) Tabs; 2.) Giant Tabs; 3.) 3" Tabs; 4.) 3 Inch Tabs; 5.) Trichlor Tabs; 6.) Sticks; 7.) Stix; 8.) Slow Stix; 9.) Slow Sticks; 10.) Chlorinating Sticks; 11.) Chlorinating Stix.

Phoenix Products Company is adding the following **Optional Marketing Language** to **EPA Reg. No. 48520-10**: 1.) Stabilized; 2.) Slow Dissolving; 3.) Sanitizer; 4.) Concentrated chlorinator for routine use; 5.) Kills bacteria destroys organic contaminants and controls algae; 6.) Kills Algae; 7.) Totally soluble; 8.) Protects against bacteria and algae; 9.) Slow dissolving; 10.) Sanitizes swimming pools; 11.) Swimming pool sanitizer.

Phoenix Products Company is adding the following **Reentry Language** to **EPA Reg. No. 48520-10**:

"PLEASE NOTE: The pH of this product is on the acid side and will tend to reduce the pH and alkalinity of pool water. Proper pH should be maintained at 7.2-7.6 as determined by a test kit, by periodic additions of sodium carbonate or sodium bicarbonate."

Phoenix Products Company is adding the following **Emergency Handling Language** to **EPA Reg. No. 408520-20**: "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."

General Comments:

Label Revisions That Are Required:

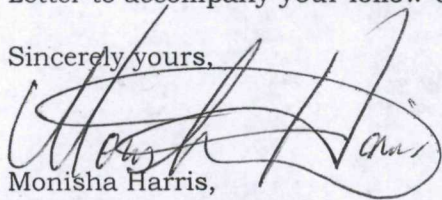
The entire "Phoenix Giant Tabs" Product Label must be written to comply with PR Notice 2000-5 (the Mandatory Language PR Notice). Specifically in the Reentry Language, "Proper pH should be maintained at 7.2-7.6 as determined by a test kit, by periodic additions of sodium carbonate or sodium bicarbonate." Revise "should be maintained" to read "must be maintained."

The "Phoenix Giant Tab" Product Label includes an Algacide Claim. However, there is no **Directions For Use** identified for Killing Algae. Add **Directions For Use** specific for Killing Algae.

The Alternate Brand Names "**SlowStix**," "**Slow Stix**," and "**Slow Sticks**" imply a change in the Rate of Application or the Method of Application. The Alternate Brand Names "**SlowStix**," "**Slow Stix**," and "**Slow Sticks**" are **Not Acceptable**. You have failed to provide evidence that they are not False and Misleading -- or that they act at a Rate or in a Method distinct from any of the other Alternate Brand Names.

If you have any questions or comments with regard to this Agency Letter, please contact Killian Swift via email at Swift.Killian@epa.gov or by telephone at **703-308-6346**. When you are submitting information or data in response to this Agency Letter, send a copy of this Agency Letter to accompany your follow-on submission in order to facilitate processing.

Sincerely yours,



Monisha Harris,
EPA Product Manager 32
Regulatory Management Branch II
Antimicrobials Division (7510P)



United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 48520-10	2. EPA Product Manager Monisha Harris	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Phoenix Giant Tabs	PM# 32	
5. Name and Address of Applicant (Include ZIP Code) Phoenix Products Company 55 Container Drive Terryville, CT 06786 <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 type="checkbox"/> Amendment - Explain below.	<input checked="" 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 checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

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

ADD Additional Name Brands, Marketing language and change reentry statement, Update Stor_Disp and add Emergency Handling -- 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, 10, 15, 25, 40 lbs

5. Location of Label Directions
 On Container

6. Manner in Which Label is Affixed to Product
 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 Agent	Telephone No. (Include Area Code) 414-281-6597
-------------------------	---------------------------	---

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.

2. Signature <i>Marianne Radtke</i>	3. Title Regulatory Agent	6. Date Application Received (Stamped)
4. Typed Name Marianne Radtke	5. Date 10/23/2012	



4/10

October 23, 2012

Document Processing Desk (NOTIF)
U.S. Environmental Protection Agency
Office of Pesticide Programs (7504P)
1200 Pennsylvania Ave. NW
Washington, D.C. 20460-0001

Re: Phoenix Giant Tabs
EPA Registration No. 48520-10

Attached is an application for notifications to the above referenced label:

- In green are requested additional brand names
- Add marketing language as listed
- Update reentry statement.
- Update Storage and Disposal and add Emergency Handling section.

Enclosed you will find:

Form 8570-1 for Notification as listed above w/ certification statement.
3 label copies with proposed changes clearly marked.

Sincerely,

Marianne Radtke
Regulatory Services
5010 So. 20th Street
Milwaukee, WI 53221
414-281-6597
mcreg1@ameritech.net

o o
ooooo
o

ccc
ooo
o o
o o o
c c c
cccc
o o o o
o o o o
o o o o o
o o o o o
o o o o o
o o o o o
o o
o o o o
o o o
o o o
o o

5/10



Phoenix Giant Tabs
EPA 48520-10

(Comments in { } are for labeling and review purposes. [] statements are optional)

{Alternate Brand names:}

- Tabs
- Giant Tabs
- 3" Tabs
- 3 Inch Tabs
- Trichlor Tabs
- Sticks
- Stix
- Stixs
- SlowStix
- Slow Stix
- Slow Sticks
- Chlorinating Sticks
- Chlorinating Stix

Marketing Language:

- [Stabilized]
- [Slow Dissolving]
- [Sanitizer]
- [Concentrated chlorinator for routine use]
- [Kills bacteria destroys organic contaminants and controls algae]
- [Kills Algae]
- [Totally soluble]
- [Protects against bacteria and algae]
- [Slow dissolving]
- [Sanitizes swimming pools]
- [Swimming pool sanitizer]

```

C C C C C C
C C C C C C
C C C C C C
C C C C C C
C C C C C C
C C C C C C
C C C C C C
C C C C C C
C C C C C C
C C C C C C
C C C C C C
C C C C C C
C C C C C C
C C C C C C

```

**KEEP OUT OF REACH OF CHILDREN
DANGER**

NOTIFICATION
Date Reviewed: 11-5-12
Reviewed By: R. Swift



[see [side] [back] panel for [First Aid] and additional precautionary statements]

FIRST AID

Have the product container or label with you when calling a 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. 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 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 the poison control center or doctor. Do not give anything by mouth to an unconscious person.

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

**[24-hour Emergency Hotline for Technical Assistance and MSDS
1-800-633-8253]**

ACTIVE INGREDIENT:

Trichloro-s-triazinetrione.....99.0%

INERT INGREDIENTS.....1.0%

TOTAL.....100.0%

Available chlorine.....89.0%

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eye damage and skin burns. May be fatal if absorbed through skin. May be fatal if inhaled. Do not breathe dust or spray mists. 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 or using tobacco. Remove contaminated clothing and wash before reuse.

7/10



ENVIRONMENTAL HAZARDS:

{If 50lbs or less, use the following statement}

This pesticide is toxic to fish and aquatic organisms.

{If over 50lbs, use the following statement}

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 the EPA.

PHYSICAL AND CHEMICAL HAZARDS:

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.

SPECIAL PRECAUTIONS (PLEASE READ)

1. This product emits a powerful chlorine gas. Do not open container indoors. Hold away from face when opening to avoid breathing fumes.
2. Prolonged contact between this product in its undissolved state and vinyl liners, painted surfaces or other property in or around the pool will result in permanent bleaching of the color. Introduce this product through the skimmer or in a prescribed feeder to avoid discoloration of liner or paint.
3. When adding this product to skimmer or feeder make sure that there are no other chemicals present as a violent reaction may occur. It is always dangerous to mix chemicals.
4. Use this product as directed per instructions on label. Do not take advice from others or experiment by yourself.



8/10

5. If this product is used to shock or superchlorinate a pool, after treatment it is important to brush walls and floor to expose algae that may be in cracks or wrinkles that might protect algae from high chlorine residual. Such protected algae will begin to reproduce again when high chlorine residual falls.

6. This product, because of its potent formulation, can be dangerous if not used properly. Do not mix with any other chemicals. This could result in a violent chemical reaction. Do not add water to this product in a closed container. Do not add this product to a small amount of water in a pail. When adding this product to skimmer make sure pump is on and water is circulating so that material is drawn into recirculation system. Do not allow build-up of dry material in skimmer as gases generated may cause an explosion.

[This product is manufactured with the most concentrated form of dry chlorine available today. They are consistent in size and slow dissolving in nature to allow you to reliably dose your pool once a week. This product contains cyanuric acid - a stabilizer that prevents ultra violet light from removing available chlorine from the pool. This product allows you to easily maintain proper chlorine residuals and help you to effortlessly produce beautiful, clean sparkling water.]

DIRECTIONS FOR USE:

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

1. Adjust water pH to 7.2-7.6 as determined by a test kit. For pools with copper plumbing best pH factor is 7.6-7.8.

2. If the pool has not been previously stabilized add conditioner and stabilizer (cyanuric acid). Follow the directions for use on the label for that product.

3. Secure chlorinator in the area of the pool that is agitated by return flow from filter. If residual remains too high chlorinator should be moved further from the agitated area which will slow the dissolving action of this product.

4. In newly filled pools, follow steps 1 through 3 then add 2 tablets [sticks] per 5,000 gallons of pool water to establish a chlorine residual of 1.0 to 1.5 p.p.m. as determined by a test kit. Repeat dosages as needed to maintain a residual of 1.0 to 1.5 p.p.m. at all times. Thereafter, add 1 tablet [stick] per 5,000 gallons per week or as needed to maintain chlorine residual of 1.0 to 1.5 p.p.m. at all times as determined by a test kit. For pools with stabilizer, follow steps 1 and 3 then add 1 tablet [stick] per 5,000 gallons per week or as needed to maintain chlorine residual of 1.0 to 1.5 p.p.m. at all times as determined by a test kit.

9/10



5. Reentry into treated swimming pools is prohibited above levels of 4 ppm of chlorine. PLEASE NOTE: The pH of this product is on the acid side and will tend to reduce the pH and alkalinity of pool water. Proper pH should be maintained at 7.2-7.6 as determined by a test kit, by periodic additions of sodium carbonate or sodium bicarbonate.

{Optional pool gallon calculation instructions}

[POOL GALLON CALCULATOR (all dimensions in feet)

Square or Rectangular: Length x Width x Average Depth x 7.5 = Gallons

Round or Oval: Length x Width x Average Depth x 5.9 = Gallons

POOL GALLON CALCULATOR (ft)

Rectangular: L x W x AvD x 7.5

Round: L x W x AvD x 5.9

HOW TO CALCULATE POOL CAPACITY

SHAPE OF POOL: GAL. OF WATER (Dimensions in feet)

Rectangular: Average depth x average length x average width x 7.5

Circular: Diameter x diameter x average depth x 5.9

Oval w/ straight sides: Full width x full length x average depth x 6.7

Irregular: Consult pool builder]

STORAGE AND DISPOSAL:

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in a dry, cool and well-ventilated area. Avoid moisture getting into container. Keep off wet floors. In case of spillage, wash with large amounts of water. After each use, keep container tightly closed. Oxidizing material. Keep away from flames, sparks and all sources of heat. Avoid contact with organic material.

{for non-residential and bulk shipments}

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER HANDLING: 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.

10/10



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

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.

DISTRIBUTED BY:

Phoenix Products Company
55 Container Drive
Terryville, CT 06786

EPA Reg. No. 48520-10

EPA Est. No. 48520-CT-002

