

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

May 13, 2013

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Ms. Marianne Radtke, Regulatory Agent for Phoenix Products Company 5010 South 20th Street
Milwaukee, WI 53221
mcrreg1@ameritech.net

SUBJECT:

FQPA Code 302 Label Amendment

PRODUCT NAME: **Phoenix Dichlor Granular** EPA REGISTRATION NUMBER: **48520-23**

APPLICATION DATE: May 15, 2013

APPLICATION RECEIVED DATE: May 15, 2013

Dear Ms. Radtke:

This acknowledges receipt of your Label Amendment application, submitted pursuant to registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) 3(c)7(A), as amended.

Pesticide Application:

This is a submission to advise the Agency of a Missing Word.

It has come to the attention of the Applicant that the subject Product Label does not have the "DANGER" Signal word as required with the Precautionary Statement heading.

The purpose of this submission is to re-establish the "DANGER" Signal Word on the Phoenix Dichlor Granular Product Label.

General Comments:

Based on the review of the submitted material, the following comments apply. The Label Amendment application is **Acceptable**. A copy of the EPA-stamped, **Accepted**, Phoenix Dichlor Granular Product Label is enclosed for the Phoenix Products records.

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

Sincerely yours,

Michael L. Mendelsohn,

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Acting EPA Product Manager 32 Regulatory Management Branch II Antimicrobials Division 7510P

Enclosure: EPA-stamped, Accepted, "Phoenix Dichlor Granular" Product Label.



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

{Alternate Brand names:}

Phoenix Granular Dichlor

Phoenix Sodium Dichlor

Phoenix Quick Dissolving Shock

Phoenix Granular Shock

Phoenix Spa Shock

Phoenix Winter Shock

Phoenix Spring Shock

Serena Spa Granular Dichlor

Serena Spa Spa ShockBlizzard Winter Shock

Blizzard Spring Shock

Sundance Spas Spas Concentrated Chlorinating Granules

Dichlor Granular

(Optional marketing statements that may be used: One or more statements may be combined.)

[For use in vinyl, painted, fiberglass or plaster surface pools.]

[Granular Stabilized Chlorinator]

[Restores water clarity.]

[Ideal for pool start-ups.]

[Ideal for white plaster pools.]

[Ideal for vinyl pools.]

[For all pool types]

[For all pool surfaces]

[Fast -acting granular algae killer.]

[Quick-dissolving]

[Quick-dissolving stabilized chlorinating granules.]

[Quick-dissolving sanitizer and oxidizer.]

[Pool Chlorinating Concentrate]

[For Shock Treatment]

[Shock Treatment]

[For Swimming Pool Superchlorination]

[Effective winter shock treatment.]

[Granular Stabilized Chlorinator]

[3-in-1 Sanitizer, Algaecide and Stabilizer]

[Stabilized]

[for pools and spas]

[Concentrated]

[Kills Bacteria and Controls Algae]

[Controls Bacteria and Algae]

[For Routine use]

[Suppresses Algae]

[Kills Bacteria, Controls Algae, and Clarifies]

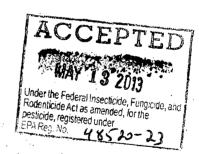
[Keeps water clear]

[For use in all pool types] {This statement alerts consumer to the fact that they may use this

product in above ground, inground, indoor, outdoor, plaster, vinyt, fiberglass pools)

[Sanitizes, Clarifies, and protects against Algae]

[Sanitizer]





[Disinfectant]

[For lasting protection against organic contaminants]

[Concentrate]

[Completely soluble]

[shock]

[Pool Algaecide]

IFor sparkling and crystal clear water!

[Destroys organic pollutants, bacteria, and algae]

[Convenient complete pool care]

[No mineral scale build-up]

[24-hr chlorine residual for round the clock activity]

(Optional marketing statements that may also be used with spa and hot tub sanitization.)

[Granular Stabilized Chlorinator]

[For spas and hot tubs]

[Quick-dissolving]

[Fast-acting]

lifor spas]

[for hot tubs]

KEEP OUT OF REACH OF CHILDREN

DANGER

[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 INHALED: Move person to fresh air. If person is not breathing, call 9/11 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 ON SKIM OR CLOTHING: Take off contaminated clothing. Rinse skim immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for 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 and MSDS Assistance: 1-800-633-8253]

ACTIVE INGREDIENT:

Sodium Dichloro-s-Triazinetrione
Hydrated 99%
Inert ingredients: 1%
TOTAL 100%
Available Chlorine 55.5%

NET WEIGHT: [1][2][4][5][10][15][25][40][50] [b[s]

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

DANGER CORROSNE. 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 contaminated clothing and wash before reuse.

PHYSICAL AND CHEMICAL HAZARDS:

STRONG OXIDIZING AGENT. Use only clean dry utensils. Mix only into 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 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, ponds, streams, 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 sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE:

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

(For products intended for swimming pool uses:)

FOR SWIMMING POOL DISINFECTANT: When used as directed, this product is effective as a swimming pool water disinfecting agent. The dosage necessary for your pool will change considerably depending upon those factors that burden the disinfection system. Some of the factors that will vary the required dosages are water temperature, bather load, exposure to windblown debris, thunder or rain storms and length of filtration cycle.

DIRECTIONS FOR USE: Ensure all pool equipment is working properly. Backwash the filter system following manufacturer's directions. Adjust pH to between 7.2 - 7.6. Add stabilizer to establish a minimum level of 30-40 ppm to reduce degradative effects of sunlight upon the chlorine residual. Check for metals. Before using this product, add stain and scale inhibitor to prevent staining of pool surface due to metals. When using other products as outlined in the directions for this product, always follow directions on those products.

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With pump running, broadcast 4 ounces of this product per 10,000 gallons directly into the water in the deep end of the pool as an initial treatment. Repeat additions until a residual of 1-3 ppm chlorine is established as determined by the use of a test kit. To prevent damage to pool surface, use a pool brush to disperse granules that may have settled to the bottom of the pool. NEVER ALLOW UNDISSOLVED PRODUCT TO REST IN CONTACT WITH BLEACHABLE POOL. SURFACES. Regular use of a test kit is necessary to determine when it is necessary to add another dose of this product to maintain a residual of 1-3 ppm available chlorine in the pool water. An average daily dose requirement is 2-3 oz. of this product per 10,000 gallons of water. After use of this product it is recommended that a preventative algae treatment be added on a weekly basis.

FOR SUPERCHLORINATION: Broadcast one pound of this product per 10,000 gallons directly into the water in the deep end of the pool. To prevent damage to pool surface, use a pool brush to disperse any granules that may have settled to the bottom of your pool. NEVER ALLOW UNDISSOLVED PRODUCT TO REST IN CONTACT WITH BLEACHABLE POOL SURFACES. In water temperatures less than 70°F, or as an alternate application procedure, pre-dissolve this product prior to applying evenly to the deep end of the pool. Dissolve this product outdoors, in a clean plastic bucket stirring with a clean plastic or wooden spoon. Add this product to water. NEVER add water to product. NEVER add more than 1 pound of this product to 3 gallons of cool water. Do not mix with other products when pre-dissolving.

REENTRY: Reentry into treated swimming pools is prohibited above levels of 3 ppm of chlorine due to risk of bodily harm.

FOR SWIMMING POOL ALGAE: When used as directed, this product kills algae and will rid your pool of unsightly algae spots. This product is ideal for use in vinyl fined, fiberglass or colored plaster surface pools.

DIRECTIONS FOR USE: Ensure all pool equipment is working properly. Blackwash the filter system following manufacturer's directions. Adjust pH to between 7.2-7.6. Check for metals and if present, add stain and scale inhibitor to prevent staining of pool surface. When using other products as outlined in the directions for this product, follow directions on those products.

Before using this product, brush all surface-clinging algae paying special attention to pool steps, ladder steps and around skimmer and lights. At night, or when pool is not in use, broadcast this product directly into the deep end of the pool with pump running. Use two pounds per 10,000 gallons for medium to heavy algae growth and one pound per 10,000 gallons for light algae growth. To prevent possible damage to pool surface, use a pool brush to disperse any granules that may have settled to the bottom of the pool. Brush any remaining algae and clean backwash filter. If algae is still visible, repeat treatment.

(For products intended for multiple uses or for winterizing products:)

[FOR WINTERIZING POOL: To avoid costly spring problems (algae, stains, cloudy water, high chlorine demand) properly prepare your pool for the winter using this product. This product oxidizes organic wastes, provides long lasting chlorine protection, helps keep pool surfaces clean, and helps protect water during the off season months.

DIRECTIONS FOR USE: NOTE: For WHITE PLASTER POOLS, broadcast this product directly into the pool water. FOR VINYL, FIBERGLASS, PAINTED AND COLORED PLASTER POOLS, PRE-DISSOLVE THE RECOMMENDED DOSE. Dissolve this product outdoors, in a clean plastic bucket stirring with a clean plastic or wooden spoon. Add this product to water. NEVER add water to product. NEVER add more than 1 pound of this product to 3 gallons of cool water. Do not mix with other products when pre-dissolving.

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Before treating the pool, chemically balance the water and adjust pH to 7.4-7.6. Brush and vacuum the pool. Backwash the filter and clean skimmer, pump baskets, and filter. Sprinkle the powder or pour the pre-dissolved treatment dose (see NOTE above) into the water around the edges of the pool. Use one pound of this product per 10,000 gallons of water. Circulate water for several hours, then apply a winterizing algae treatment following appropriate directions. Cut off pump. Drain equipment or add a swimming pool antifreeze to equipment to prevent freeze damage. Install pool cover.

A second treatment of the product in mesh covered or non-covered pools may be required prior to water freezing (mid-winter). If second treatment is required, re-dissolve treatment (see NOTE above) and pour along edges of the pool.]

{For products intended for multiple uses or for spas or hot tubs:}

IFOR SPA AND HOT TUB DISINFECTANT: When used as directed, this product is effective as a spa and hot tub water disinfecting agent.

DIRECTIONS FOR USE: Ensure all spa and hot tub equipment is working properly. Backwash/clean the filter system following manufacturer's directions. Adjust the pH to between 7.2-7.6. When using other products as outlined in the directions for this product, always follow directions on those products.

MAINTENANCE DOSES: With pump on, add 1/2 teaspoon of this product per 100 gallons of water (or 5 teaspoons per 1,000 gallons) as an initial treatment. Repeat at 15 to 20 minute intervals until a residual of 3-5 ppm of available chlorine is established as determined by test kit. A test kit must be used regularly to determine the frequency of additional doses of this product needed to maintain the chlorine residual of 3-5 ppm.

SUPERCHLORINATION: Use one teaspoon of this product per 100 gallons of water (or 1/4 cup per 1,000 gallons). Superchlorination may be needed on a nightly basis in a heavily used spa or as infrequently as once a week in a moderately used spa.

REENTRY: Reentry into treated spas is prohibited above levels of 5 ppm of chlorine due to risk of bodily harm.]

{Optional pool gallon calculation instructions}

IPOOL 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: Lx Wx AvD x 7.5 Round: L x W x AvD x 5.91

IHOW 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

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

Diameter x diameter x average depth x 5.9

Consult pool builder]

irregular:

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STORAGE AND DISPOSAL:

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

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.

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 Controll Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for quidance.

CONTAINER HANDLING: Non-refilable container. Do not reuse or refill this container. Offer for recycling, if available. Triple rinse container (or equivalent) promptly after emptying.

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

SPILLS: When handling or dealing with spills, use impact-resistant goggles with side-shields, or face shield; body-covering clothes, including impervious rubber or plastic gloves and boots; use a dust respirator if dusting occurs. Sweep up dry spills and dispose of as described for pesticide disposal if drum contents are contaminated or decomposing, do not reseal container, isolate unsealed drum in the open or in a well-ventilated area; flood with large volumes of water if necessary.

DISTRIBUTED BY:

Phoenix Products Company 55 Container Drive Terryville, CT 06786

EPA Reg. No. 48520-xxx:

EPA Est. No. 48520-CT-002