

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

January 10, 2006

Heather R. Bjornson
Regulatory Assistant
King Technology, Inc.
530 11th Avenue South
Hopkins, MN 55343

Subject: Sani-King P-Max VIII Cartridge
EPA Registration No. 53735-2
Application Date: December 12, 2005
Receipt Date: December 14, 2005

Dear Ms. Bjornson:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

Proposed Notification

- addition to Environmental Hazard Statement per Agency letter dated April 20, 2005.

General Comments

Based on a review of the material submitted, the following comments apply:

The notification application is acceptable and a copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6345.

Sincerely,

Wanda Y. Henson
Product Reviewer (32)
Regulatory Management Branch II
Antimicrobials Division (7510C)

CONCURRENCES							
YMBOL	7510C	7510C					
JRNAME	E. Berg	Henson					
ATE	1/10/06	1/10/06					

**WASHINGTON**

1101 17th Street, N.W.
Suite 500
Washington, D.C. 20036
Telephone 202 223-4392
Fax 202 872-0745

Emily Mitchell, PM 32
Office of Pesticide Programs
1801 South Bell Street
Arlington, VA 22202

December 12, 2005

**RE: King Technology, Inc.: Sani-King P-Max VIII Cartridge
(EPA Reg. No. 53735-2)**

Notification to add Environmental Hazards Statement

Dear Ms. Mitchell:

With this letter, Technology Sciences Group is submitting on behalf of King Technology, Inc. (KTI), a notification to add the Environmental Hazards statement accidentally omitted from the product labeling in the amendment submitted October 27, 2005. This Environmental Hazards statement was request by the Agency in a letter dated April 20, 2005. I have attached a copy of this letter for easy reference.

You will find in support of this notification:

- 1) EPA Application Form (8570-1);
- 2) One redline copy of the label (highlighting all changes in red font); and
- 3) Three clean copies of the label.

Should you have any questions or comments, please do not hesitate to contact me directly at (202) 828-8945 or via e-mail hbjornson@tsqusa.com.

Sincerely,

Heather R. Bjornson
Regulatory Assistant for King Technology, Inc.

SACRAMENTO

712 Fifth Street
Suite A
Davis, CA 95616
Telephone 530 757-1298
Fax 530 757-1299

CANADA

275 Slater Street
Suite 900
Ottawa, Ontario
K1P 5H9
Telephone 613 247-6285
Fax 613 236-3754



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 53735-2	2. EPA Product Manager Emily Mitchell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Sani-King P-Max VIII Cartridge	PM# 32	
5. Name and Address of Applicant (Include ZIP Code) King Technology, Inc. 530 11th Avenue South Hopkins, MN 55343 <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 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 type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

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

This notification is to add the accidentally omitted Environmental Hazards qualifying statement per the EPA letter dated April 20, 2005 to the product label. 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 for 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:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt. No. per container		<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> _____	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Heather R. Bjornson, Technology Sciences Group, Inc.		Title Regulatory Assistant		Telephone No. (Include Area Code) (202) 828-8945	
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.					6. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Assistant to King Technology, Inc.			
4. Typed Name Heather R. Bjornson		5. Date December 12, 2005			

{All text in brackets [xxx] is optional and may or may not be included on a final label.}
{All text in braces {xxx} is administrative and will not appear on a final label.}

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{MASTER LABEL}

Sani-King P-Max VIII Cartridge

[For use only in the P-Max System]

[1-inch tablets]
[3-inch tablets]
[3-inch pucks]
[Sticks]

KEEP OUT OF REACH OF CHILDREN

DANGER

SEE FIRST AID AND ADDITIONAL PRECAUTIONARY
STATEMENTS ON BACK PANEL

Active Ingredient:

Trichloro-s-triazinetriene.....99%
Other Ingredients:..... 1%
Total..... 100%

Available Chlorine: 90%

Net Wt. _____

EPA REG. NO: 53735-2

EPA EST. NO: 71187-MO-001

Manufactured by: **KING TECHNOLOGY, INC.**
530 11th Avenue S., Hopkins, MN 55343 USA
www.kingtechnology.com

FIRST AID: If Inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. 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. **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 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. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

King Technology, Inc.

Sani-King P-Max VIII Cartridge (EPA Reg. No. 53735-2)

Notification dated December 12, 2005

Page 1 of 5

{Directions to be used for pool cartridge}

DIRECTIONS FOR USE:

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

PRODUCT DESCRIPTION:

This [chamber] [pac] is part of an advanced system that uniformly feeds chlorine, efficiently kills bacteria and controls algae continuously for weeks under normal conditions in a stabilized pool. The conveniently disposable [chamber] [pac] lets you control the rate of chlorine delivery to meet changing conditions in your pool, by simply adjusting the control dial on the chlorine delivery system. You never have to touch the chlorinating tablets.

USE DIRECTIONS:

1. Adjust pH level to 7.2-7.8.
2. Bring Free Available Chlorine (FAC) residual to 1.0-1.5 ppm using a chlorine shock. Follow Manufacturer's Label Directions.
3. Stabilize the pool with cyanuric acid stabilizer. Follow Manufacturer's Label Directions.
4. **To install [chamber] [pac]:** Take feeder cap off. Remove [chamber] [pac] colored caps. Hold [chamber] [pac] so the open end faces down. Insert into feeder. The end of the [chamber] [pac] must align with the key located inside the feeder at the bottom. **DO NOT FORCE.** Replace feeder cap and set the control dial to the appropriate setting. For a guideline, using a 13,500 gallon pool with a pump running 8 hours per day, begin with the control dial set on #3. For a 18,000 gallon pool, start at setting #4. To achieve the proper FAC, turn the control dial to the next higher setting to increase the FAC and turn it to the next lower setting to decrease the FAC. Operate the pool for 1 day. Check the FAC residual and increase/decrease one setting per day until you achieve 1.0-1.5 ppm. Pool should not be entered until the chlorine residual is 1.0-1.5 ppm.
5. Once you have determined the proper setting for your pool, you should not have to re-adjust the setting under normal conditions. Should conditions change (i.e. weather, rain, pool use, bather load, etc.) the control dial can be easily adjusted to increase or decrease the chlorine feed.
6. Superchlorinate if needed. Do not add shock treatment to the skimmer. Turn control dial to "minimum" before super-chlorinating. Once desired FAC has been obtained, return the control dial to the normal operating setting.
7. Periodically check the [chamber] [pac] and replace with a new one when empty. Do not attempt to open or refill this [chamber] [pac]. **DO NOT REUSE.**

{Directions to be used with Pool Frog Mineral Reservoir EPA Reg. No. 53735-11}

DIRECTIONS FOR USE:

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

PRODUCT DESCRIPTION:

This [chamber] [pac] is part of an advanced pool care system that uses the Pool Frog Mineral Reservoir (EPA Reg. No. 53735-11) with low levels of chlorine to destroy bacteria continuously for weeks under normal conditions in a stabilized pool. The conveniently disposable [chamber] [pac] lets you control the rate of chlorine delivery to meet changing conditions in your pool, by simply adjusting the control dial on the chlorine delivery system. You never have to touch the chlorinating tablets.

USE DIRECTIONS:

1. Adjust pH level to 7.2-7.8.
2. Bring Free Available Chlorine (FAC) residual to 1.0 ppm using a chlorine shock. Follow Manufacturer's Label Directions.
3. Stabilize the pool with cyanuric acid stabilizer. Follow Manufacturer's Label Directions.
4. **To install [chamber] [pac]:** Take feeder cap off. Remove [chamber] [pac] colored caps. Hold [chamber] [pac] so the open end faces down. Insert into feeder. The end of the [chamber] [pac] must align with the key located inside the feeder at the bottom. **DO NOT FORCE.** Replace feeder cap and set the control dial per the size and pump run time of your pool according to the chart in the manual included with the Mineral Reservoir. Monitor chlorine level daily for the first week to determine correct dial setting. Turn the control dial to the next higher setting to increase the FAC and turn it to the next lower setting to decrease the FAC. Check the FAC residual and increase/decrease one setting per day until you achieve at least 0.5 ppm. Pool should not be entered until the chlorine residual is at least 0.5 ppm.
5. Once you have determined the proper setting for your pool, you should not have to re-adjust the setting under normal conditions. Should conditions change (i.e. weather, rain, pool use, bather load, etc.) the control dial can be easily adjusted to increase or decrease the chlorine feed.
6. Superchlorinate if needed. Do not add shock treatment to the skimmer. Turn control dial to "minimum" before super-chlorinating. Once desired FAC has been obtained, return the control dial to the normal operating setting.
7. Periodically check the [chamber] [pac] and replace with a new one when empty. Do not attempt to open or refill this [chamber] [pac]. **DO NOT REUSE.**

{Directions to be used for spa cartridge}

PRODUCT DESCRIPTION:

Use this cartridge in either the In-line Spa System, the Floating Spa System or as a free-floating sanitizer. When the cartridge is used as directed, spa care is easy and spa water is crystal clear.

DIRECTIONS FOR USE:

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

Ensure all spa equipment is working properly. The pump and filter should be operated for at least 3 hours per day. Clean filter following manufacture's directions. Adjust pH to between 7.2 – 7.8 and total alkalinity to 60-120 ppm. When using other products as outlined in directions for this product, always follow directions on those products. Spa temperature recommended at 102° but not to exceed 104°. Keep the spa free of leaves and debris. Residential spas and hot tubs should be drained and filled with fresh water periodically. See you spa manufacturer's directions.

Using the In-line Spa System: Set the cartridge at #1 by holding the bottom and turning the top until the number 1 appears in the setting window. To install: open cap on In-Line System and turn cartridge holder counter-clockwise to unlock. Pull holder out. Snap cartridge into "lower" section. Make sure to line up indent on cartridge with raised line on holder. After cartridge is snapped in, replace holder by lining up arrow on holder with arrow on system lip, push down and lock in place. Replace cap. Initially monitor chlorine levels daily until a 1.0-1.5 ppm residual is

achieved. Remove and adjust cartridge to maintain a chlorine level depending on spa size and use.

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Using the Floating Spa System: Set the cartridge at #1 by holding the bottom and turning the top until the number 1 appears in the setting window. To install: push the cartridge into the bottom opening of the Floating Spa System. Set entire system in the spa water. Initially monitor chlorine levels daily until a 1.0 - 1.5 ppm is achieved. Then adjust to maintain a chlorine level depending on spa size and use.

Using as a Free Floating Sanitizer: Set cartridge as described for the Floating Spa System and allow to free float in spa.

FOR ALL USES: Adjusting to a higher setting will increase the chlorine output while a lower setting will decrease it. When empty follow disposal instructions and replace with a new cartridge.

REENTRY into treated spas is prohibited above levels of 3 ppm chlorine.

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.

PHYSICAL OR CHEMICAL HAZARDS: Corrosive: Strong oxidizing agent. Do not refill empty [chamber] [pac] [cartridge]. Use only clean dry utensils. Mix only into water. Contamination with moisture, dirt, organic matter or other chemicals (including other [pool] [spa] chemicals) or any other foreign matter may start a chemical reaction with generation of heat, liberation of hazardous gases and possible fire and explosion. Avoid any contact with flaming or burning material such as a lighted cigarette. Do not use this product in any [chlorinating] [dispensing] 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 statement for end-use products of less than 5 gallons (liquid) or less than 50 pounds (solid, dry weight).

ENVIRONMENTAL HAZARD: This pesticide is toxic to fish and aquatic organisms.

STORAGE AND DISPOSAL:

Do not contaminate food or feed with this product.

Product Storage: Store delivery [chamber] [pac] [cartridge] in original container in a cold, dry, well ventilated area away from heat or open flame. In case of decomposition, isolate container and flood area with large amounts of water to dissolve all material before discarding this chamber.

{Disposal directions for pool cartridge}

Product Disposal: This [chamber] [pac] is designed for one time use. When empty, triple rinse in pool water, drain, wrap in newspaper and discard in trash.

{Disposal directions for spa cartridge}

Product Disposal: Do not reuse empty cartridge, but place in trash collection. Rinse thoroughly before discarding in trash.

{Optional notes for labels}

[IMPORTANT:

The warranty will be void if this [chamber] [cartridge] is not used with the appropriate feeder. Fire or explosion may result if this [chamber] [cartridge] is used with an incorrect chemical feeder.]

[NOTE: Some settling may occur during shipment.]

[NOTE: Buyer assumes all responsibility for safety and use not in accordance with directions.]

[DO NOT REMOVE LABEL]

[IN CASE OF MEDICAL EMERGENCY CALL 1-800-424-9300]

[NPTN Hotline number for public information 1-800-858-7378]

[U.S. Patent Numbers xxxx]

[World Patents Pending]