

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

June 21, 2018

Abigail Downs Wacek Regulatory Agent for King Technology, Inc. 530 11th Avenue South Hopkins, MN 55343

Subject: Label Amendment – Update Use Directions and Optional Claims

Product Name: Spa Bromine Disinfectant EPA Registration Number: 53735-10 Application Date: May 20, 2018

Decision Number: 539983

Dear Ms. Wacek:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Page 2 of 2 EPA Reg. No. 53735-10 Decision No. 539983

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Wanda Henson by phone at (703) 308-6345 or via email at henson.wanda@epa.gov

Sincerely,

Demson Fuller, Product Manager 32 Regulatory Management Branch II Antimicrobials Division (7510P) Office of Pesticide Programs

Enclosure

{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.} [Alternate Brand Name: Spa Frog Bromine Cartridge]

{MASTER LABEL}

SPA BROMINE DISINFECTANT Pre-filled Bromine [Spa] [Hot Tub] Sanitizer

[For use only in the King Brom Feed System]

[Uniformly feeds bromine]
[Precisely meters bromine]
[Controls the rate of bromine delivery]
[Controls algal, bacterial, and fungal slimes continuously for weeks]
[Never touch the bromine]
[Pre-filled for no mess and less odors]

[A MICROBIOCIDAL [BACTERICIDE], [FUNGICIDE], [ALGAECIDE] [AND]
[SLIMICIDE] [FOR TREATING] [RECIRCULATING COOLING WATER IN INDUSTRIAL
COOLING SYSTEM[S] [AND] [INDUSTRIAL ONCE-THROUGH COOLING WATER
SYSTEMS]]

Keep Out of Reach of Children DANGER SEE [FIRST AID AND] PRECAUTIONARY STATEMENTS ON [BACK] [SIDE] PANELS

[See enclosed manual and product label for complete directions for use]

1-Bromo-3-Chloro-5, 5-Dimethylhydantoin......96.0%

Active Ingredient:

Net Wt.:

Other Ingredients:	4.0%	
Total:		
EPA Reg. No.:	53735-10	
EPA Est. No.:	XXXXX-XX-X	ACCEPTED
Manufactured By:	King Technology, Inc. 530 11 th Avenue South Hopkins, MN 55343	06/21/2018 Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the
	www.[website].com	pesticide registered under EPA Reg. No. 53735-10

{as indicated on container}

King Technology: Spa Bromine Disinfectant Label Revision: March 19, 2018

Page 1 of 13

FIRST AID: 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 by 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. 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.

IN CASE OF MEDICAL EMERGENCY CALL 1-800-424-9300.

Product Description: {Stand Alone Canister for [Spa] Hot Tub Use} When used as directed SPA BROMINE DISINFECTANT is effective as a residential [spa] [hot tub] water disinfectant.

Directions For Use: {Stand Alone Canister for [Spa] [Hot Tub] Use}

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

Ensure all [spa] [hot tub] equipment is working properly. Clean filter following manufacturer's directions. Adjust pH between 7.2-7.8 and total alkalinity to 80-120 ppm. When using other products as outlined in directions for this product, always follow directions on those products.

Place this product in [spa] [hot tub] and let it float freely in [spa] [hot tub]. Under normal use conditions, use one dispenser per 350 gallons of [spa] [hot tub] water. However, under heavy bather loading or reduced water circulation, additional dispensers may be used to maintain constant active bromine residuals of 2-4 ppm in residential [spas] [hot tubs]. To increase the bromine residual, turn the rotating cap to a higher number located in the flow indicator window. To decrease the bromine residual, turn the rotating cap to a lower number in the flow indicator window.

To a freshly filled [spa] [hot tub], begin with an indicator setting of # 5. Check bromine residuals frequently. When 2-4 ppm bromine residual is obtained, lower the indicator setting to maintain constant recommended bromine residuals.

The pump and filter should be operated for at least three hours a day. Keep the [spa] [hot tub]free of leaves and debris. Residential [spas] [hot tubs] should be drained and filled with fresh water periodically. See your [spa] [hot tub] manufacturer's directions.

Product Description: {Cartridge for System Use in [Spas] [Hot Tubs]} Use the SPA BROMINE DISINFECTANT Cartridge in [either] the [Spa Frog Inline System] [or]

King Technology: Spa Bromine Disinfectant Label Revision: March 19, 2018 Page 2 of 13 [Floating System] along with the Spa Frog Mineral Cartridge (EPA Reg. No.: 53735-11) for complete and easy [spa] [hot tub] care with water that's crystal clear and odor free.

Directions for Use: {Cartridge for System Use in [Spas] [Hot Tubs]} 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] [hot tub] equipment is working properly. The pump and filter should be operated for at least 3 hours per day. Clean filter following manufacturer's directions. Adjust pH to between 7.2 – 7.8 and total alkalinity to 80 – 120 ppm. When using other products as outlined in directions for this product, always follow directions on those products. [Keep the [spa] [hot tub] free of leaves and debris.]

{One of the following statements will appear on the label}
[Residential [spas] [hot tubs] should be drained and filled with fresh water periodically.
See your [spa] [hot tub] manufacturer's directions.] [To maintain clear, clean water and ensure performance of your [spa] [hot tub] chemicals, water should be drained and [spa] [hot tub] refilled with fresh water periodically or as per [spa] [hot tub] manufacturer's instructions.] [Residential [spas] [hot tubs] should be drained and refilled with fresh water every 60 days or as per [spa] [hot tub] manufacturer's instructions.]

Before using Cartridge: With a freshly filled [spa] [hot tub] establish a [bromine] [or] [chlorine] residual of 1.0-2.0 ppm with [Frog Jump Start] [an EPA approved [spa] [hot tub] shock] [or by other means] by following directions on [the package] [that product].

[Setting the Cartridge: Initially set cartridge per your gallon size: 200 gallons set #0, 250-300 gallons set #1, 350 gallons set #2, 400 gallons set #3, 450 gallons set #4, 500-550 gallons set #5 and 600 gallon set #6. Hold bottom and turn top until number appears in the setting window.]

Using the In-line Mineral [Spa] [Hot Tub] System: [For the first 24 hours, set the SPA BROMINE DISINFECTANT Cartridge at #3 by holding the bottom and turning the top until the number 3 appears in the setting window.] [Set the SPA BROMINE DISINFECTANT Cartridge per the chart in your manual based on gallon size.] To install: open cap of Inline System, push down and turn cartridge holder counter-clockwise to unlock. Pull holder out. Snap cartridge into "Bromine or SmartChlor" 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. When using as directed with the Spa Frog Mineral Cartridge, maintain at least a 1.0 ppm bromine level. Otherwise maintain a 2.0 – 4.0 ppm bromine level.

Using the Floating Mineral [Spa] [Hot Tub] System: [For the first 24 hours, set the SPA BROMINE DISINFECTANT Cartridge at #5 by holding the bottom and turning the top until the number 5 appears in the setting window.] [Set the SPA BROMINE DISINFECTANT Cartridge per the chart in your manual based on gallon size.] To install: push the cartridge into the bottom opening of the Floating [Spa] [Hot Tub] System. For best results, push a Spa Frog Mineral Cartridge set on #6 into the other opening. [Set] [Place] entire system in the [spa] [hot tub] water. When using as directed with the Spa Frog Mineral Cartridge, maintain at least a 1.0 ppm bromine level. Otherwise maintain

King Technology: Spa Bromine Disinfectant Label Revision: March 19, 2018 Page 3 of 13 a 2.0 – 4.0 ppm bromine level. Initially test water daily and adjust the cartridge up or down depending on [spa] [hot tub] size and use until desired bromine level is achieved. For best results at measuring low bromine levels, use the Frog Test Strips.

[Using as a Free Floating Sanitizer: Set cartridge as described for the Floating [Spa] [Hot Tub] System and allow to free float in [spa] [hot tub]. When using it with a Spa Frog mineral product, maintain at least a 1.0 ppm bromine level. When using it as a stand alone disinfectant, maintain a 2.0 – 4.0 ppm bromine level.]

[FOR ALL USES:] [Once installed] [After placing in [spa] [hot tub]]: Initially test water daily and adjust the cartridge up or down depending on [spa] [hot tub] size and use until desired bromine level is achieved. For best results at measuring low bromine levels, use the Frog Test Strips. Adjusting to a higher setting will increase the bromine output while a lower setting will decrease it. When empty follow disposal instructions and replace with a new Spa Bromine Disinfectant Cartridge.

[Setting Window]

REENTRY into treated [spas] [hot tubs] is prohibited above levels of 5 ppm available bromine as measured by a suitable test kit due to risk of bodily injury.

{Optional language for 200-gram cartridge}

[For in-Line System Use Only]

[Use this Spa Bromine Disinfectant Cartridge in the In-line [Spa] [Hot Tub] System only.]

[DO NOT use this cartridge with the Floating [Spa] [Hot Tub] System.]

[Lasts Longer*]
[33% More*]
[33% More Bromine*]
[Bromine Lasts Longer*]
[33% More Bromine Lasts Longer*]
[*compared to the 150 gram Spa Bromine Disinfectant]

Product Description: {Evaporative Cooler}. When used as directed, this product effectively controls algal, bacterial and fungal slimes in evaporative coolers.

Directions for Use: {Evaporative Cooler} 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.

Shut off water to evaporative cooler. Secure new Bromine Disinfectant Cartridge to water supply line leaving the preset output window at setting #1. Make sure the water supply is attached at the top of the Bromine Disinfectant Cartridge and that both water delivery lines are attached at the base of the container. Turn water on and ensure there are no leaks.

King Technology: Spa Bromine Disinfectant Label Revision: March 19, 2018 Page 4 of 13 Maintain a 1-3 ppm bromine residual for at least four hours treatment. Repeat throughout the cooling season. A new Bromine Disinfectant Cartridge should be inserted at the beginning of the cooling season and replaced when empty thereafter. See Evaporative Cooler manufacturer's directions on adjusting amount of drainage water and water cycle times for the Evaporative Cooler.

Product Description: {Cooling Water Systems}

[Industrial Recirculating Cooling Water Systems]

[This [cartridge] [chamber] [pac] [pack] is part of an advanced system that uniformly feeds bromine to achieve one part per million (ppm) to effectively control algal, bacterial, and fungal slimes in commercial and industrial cooling towers; influent water systems such as flow-through filters, cooling ponds, canals and lagoons; heat exchange water systems; industrial water scrubbing systems; brewery and canning pasteurizers and industrial air washing systems equipped with a mist eliminator. The conveniently disposable [cartridge] [chamber] [pac] [pack] lets you control the rate of bromine delivery by simply adjusting the control dial on the King Brom Feed System. [You never have to touch the bromine.]]

[Once-through Industrial Cooling Water Systems]

[This [cartridge] [chamber] [pac] [pack] is part of an advanced system that uniformly feeds bromine to achieve one part per million (ppm) to effectively control algal, bacterial, and fungal slimes in once-through and closed-cycle fresh and sea water cooling systems, cooling ponds, canals, and lagoons. The conveniently disposable [cartridge] [chamber] [pac] [pack] lets you control the rate of bromine delivery by simply adjusting the control dial on the bromine delivery system. [You never have to touch the bromine.]]

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.

- 1. This [cartridge] [chamber] [pac] [pack] is for use only in the King Brom Feed System.
- 2. To install [cartridge] [chamber] [pac] [pack]: Take feeder cap off. Remove [cartridge] [chamber] [pac] [pack] [colored caps] [cut offs]. Hold [cartridge] [chamber] [pac] [pack] so the open end faces down. Insert into feeder. The end of the [cartridge] [chamber] [pac] [pack] 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.
- 3. Set control dial to setting #xx. Check the bromine residual and increase/decrease as needed to achieve 1.0 ppm for at least 4 hours or desired ppm.

King Technology: Spa Bromine Disinfectant Label Revision: March 19, 2018 Page 5 of 13 **4.** Periodically check the [cartridge] [chamber] [pac] [pack] and replace with a new one when empty. Do not attempt to open or refill this [cartridge] [chamber] [pac] [pack]. **DO NOT REUSE.**

PRODUCT DESCRIPTION: {Commercial [Spas] [Hot Tubs]}

This [chamber] [pac] [cartridge] [pack] is a bromine disinfectant that is fed through an advanced system to effectively kill bacteria in commercial [spas] [hot tubs]. The conveniently disposable [chamber] [pac] [cartridge] [pack] precisely delivers bromine to meet bather load demands or changing conditions in the [spa] [hot tub], by simply adjusting the control dial on the delivery system. You never have to touch the bromine chemical.

DIRECTIONS FOR USE:

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

- 1. Adjust the Total Alkalinity to 80-120 and the pH level to 7.2-7.8.
- 2. Use a chlorine shock to create an initial residual in the water. Follow Manufacturer's Label Directions.
- 3. Insert a [chamber] [pac] [cartridge] [pack] into the delivery system by following these steps: Take system cap off. Remove [chamber] [pac] [cartridge] [pack] [colored caps] [cut offs]. Hold [chamber] [pac] so the open end faces down. Insert into system. The end of the [chamber] [pac] [cartridge] [pack] must align with the key located inside the feeder at the bottom. DO NOT FORCE. Replace system cap.
- 4. Set the control dial starting at dial setting #XX. Check bromine level after 24 hours. If lower than 4.0-6.0 ppm, increase dial setting by one number and check again in 24 hours. Continue this process until the dial setting results in a consistent 4.0 to 6.0 ppm bromine reading.
- 5. Shock the water regularly or as required by local regulatory organizations.
- 6. Periodically check the [chamber] [pac] [cartridge] [pack] and replace with a new one when empty. Do not attempt to open or refill this [chamber] [pac] [cartridge] [pack]. **DO NOT REUSE**.

PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: DANGER: Corrosive. Causes irreversible eye damage and skin burns. Harmful if swallowed. Irritating to nose and throat. Do not get in eyes, on skin or on clothing. Avoid breathing dust and fumes. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco or using the toilet. Remove contaminated clothing and wash before reuse. Follow directions for use carefully.

PHYSICAL AND CHEMICAL HAZARDS: STRONG OXIDIZING AGENT: [Non-refillable container. Do not attempt to refill empty [cartridge] [chamber] [pac] [pack].] Place only in water or installed equipment made for this product. Do not add this product to any [chlorinating] [brominating] dispensing device which has been used with any inorganic or unstabilized chlorinating compounds (e.g. calcium hypochlorite). Such use may cause fire and explosion. Contamination with moisture, organic matter or other chemicals (including other [pool] [spa] [hot tub] 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.

{Environmental hazards statement for end-use products of less than 50 pounds (solid, dry weight).}

King Technology: Spa Bromine Disinfectant Label Revision: March 19, 2018 **ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish and aquatic organisms.

STORAGE AND DISPOSAL:

Do not contaminate food or feed with this product.

Storage: Store [cartridge] [chamber] [pac] [pack] [product] 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 material before discarding this [container] [cartridge] [chamber] [pack].

{Disposal directions for Canister and Cartridge used in [Spas] [Hot Tubs]} Pesticide Disposal: Product or rinsates that cannot be used must be diluted with water before disposal in a sanitary sewer.

(Disposal directions for Cooling Water Systems)

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide 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: Non-refillable container. Do not reuse or refill this [container] [cartridge] [chamber] [pac] [pack]. Offer for recycling if available. Rinse thoroughly before recycling or discarding in trash.

King Technology: Spa Bromine Disinfectant Label Revision: March 19, 2018 Page 7 of 13

{Clear Child Resistant Outer Sleeve}

EASY DIRECTIONS: {Canister}

- 1) Twist cap to setting #5.
- 2) Put chemical dispenser in [spa] [hot tub] water.
- 3) Test bromine residual frequently (approx. every 2 hours).
- Upon achieving 2-4 ppm REDUCE TO MAINTENANCE SETTING #1-#2 for maximum longevity.

TO ADJUST SETTING: {Canister}

- 1) For ease of adjustment place in water.
- 2) Grip cap firmly in one hand.
- 3) With other hand, grip below windows firmly. (Fingers should grip only bottom of canister.)
- 4) Turn cap and outer sleeve in opposite directions.

{Optional copy for labels}

[IMPORTANT:

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

[Patents: www.KingTechnology.com/IP]

King Technology: Spa Bromine Disinfectant Label Revision: March 19, 2018 Page 8 of 13

{All text on this page is optional for marketing in conjunction with the POOL FROG Mineral Reservoir 53735-11}

Spa Frog Floating System+

+FROG Mineral System consists of the FROG minerals silver chloride and carbonate used in conjunction with 1.0 ppm bromine. SPA FROG Mineral Cartridge [EPA Reg. No. 53735-11] must be used in conjunction with the SPA FROG Bromine Cartridge [EPA Reg. No. 53735-11], an EPA registered bromine or chlorine [spa] [hot tub] product or a chlorine delivery device.

Adopt a FROG for Worry Free Water
Less work with no daily dosing
Reduce bromine use up to 50%*
*Compared to the minimum ANSI recommended bromine level of 2.0 in a [spa] [hot tub]

Adopt an easier, more fun [spa] [hot tub] environment
Mineral Cartridge must be replaced every 4 months
Note: You may still feel the "spent" minerals inside, but they are no longer effective and need to be replaced. Simply discard in trash

Open for carrying handle Free FROG Jump Start Shock Inside Free FROG Test Strips Inside

Spa FROG In-Line System
Spa FROG Mineral and Bromine [Spa] [Hot Tub] Care
Experience the FROG Difference

Enjoy clearer, cleaner [spa] [hot tub] water with the help of minerals Soft feeling water that's easier on your skin Reduces faded swimsuits and smelly odors

[FROG offers more fun –] relaxation and peace of mind Easy Top Loading Cartridges, Bromine Cartridge [lasts [2] [3]-4 weeks], Mineral Cartridge [lasts 4 months], Floating [Holder] [System]

Mineral Hybrid Water Care Side flap goes inside of box Center flap goes outside of box

200 Gram Bromine Cartridges for the Spa FROG In-Line System Only! Ask your dealer if your [spa] [hot tub] came with a Spa FROG In-Line System Less bromine with minerals helping to control bacteria Less work with pre-filled disposable cartridges

200 gram Bromine Cartridge for longer life 33% more Bromine^ ^Compared to the 150 gram bromine [cartridge]

For use in the Spa FROG In-Line System [only] [for Caldera Spas] Fit's Caldera Spas

King Technology: Spa Bromine Disinfectant Label Revision: March 19, 2018 Page 9 of 13

{All text on this page is optional for marketing in conjunction with the POOL FROG Mineral Reservoir 53735-11}

[Start-up] [Maintenance] [Kit] For [Spas] [Hot Tubs] Fresh Mineral Water with Bromine

An innovative slow-dissolving mineral system that destroys bacteria while using less bromine – creating cleaner, clearer and softer water

Fresh Mineral Water Easy - A [proprietary] [innovative] [exclusive] water care solution from FROG that delivers 4 primary advantages

Our exclusive water care system works in a whole different way. The combination of FROG minerals and a low level of bromine allow you to enjoy 4 advantages:

Our exclusive mineral technology [creates a more relaxing hot tub experience that] [simplifies water care and] provides 4 advantages:

The fresh alternative to [100%] bromine [alone]. Enjoy these 4 advantages:

Fresh Mineral Water - The Alternative Way to Sanitize

A fresh approach to clean, clear water using mineral technology that uniquely offers these 4 advantages:

- CLEANER [water] [means it] [because it] kills bacteria 2 ways [– with minerals and a low level of bromine]
- Minerals help keep the pH balanced for CLEARER water that shines
- Minerals condition the water for [a]SOFTER [effects] [feel]
- Cartridges are pre-filled for no [mess, no guess, no stress] [touching or measuring] [bromine]. Making maintenance EASIER

Unlike chlorine, bromine slowly dissolves in hot water so it's easier to regulate. Plus far less odors Works effectively in a wide range of pH with less monitoring Bromine is less impacted by pH swings ensuring sanitizing effectiveness Regenerates itself with a chlorine or non-chlorine shock

Adjustable cartridges for precise output that lasts for weeks Bromine use is reduced by up to 50% with FROG minerals

Fresh Mineral Water Cartridge [lasts 4 months], Bromine Cartridge [lasts 2-4 weeks], Cartridge Holder

[Contains] 1 Fresh Mineral Water Cartridge, # Bromine Cartridge[s], # FROG Test Strips, # FROG Jump Start "start-up shock"

Creates Fresh Mineral Water [that's]

- Cleaner because it kills bacteria two ways
- Clearer because it helps keep pH [in an acceptable range] [balanced]
- Softer because [minerals condition the water for softness] [there's up to 50% less bromine]
- Easier with pre-filled cartridges for no mess, [no guess, no stress] [or measuring]

Easy [Spa] [Hot Tub] Start-up

King Technology: Spa Bromine Disinfectant Label Revision: March 19, 2018 Page 10 of 13

(All text on this page is optional for marketing in conjunction with the POOL FROG Mineral Reservoir 53735-11)

FROG Test Strips

- It's the only strip with the ideal bromine range for FROG [spas] [hot tubs]
- Most test strips show this level as too low causing confusion
- FROG Test Strips help dial in the right setting for your [spa] [hot tub]
- The result: Your Bromine Cartridges will last up to 50% longer
- Using standard test strips can lead to over bromination and wasting money
- Accurately measures the reduced bromine level of 1.0 to 2.0 ppm
- · Adjust your cartridge setting to maintain the ideal FROG bromine range
- · Get a longer life to your bromine cartridge

FROG Jump Start

- Start-up shock removes contaminants and sets the residual
- Effervescent action helps the chlorine dissolve faster
- Takes the start-up load off the Bromine Cartridge so it lasts longer
- Use when draining and re-filling the [spa] [hot tub] up to [500] [600] gallons
- Use for easy [spa] [hot tub] start-up
- Not just clean. Serene.
- Hot Tub Sanitizer adjusts up to 600 gallons
- Reusable cartridge holder allows for easy cartridge replacement
- Proprietary Minerals with Bromine
- [FROG] minerals reduce bromine use up to 50%
- 2[X] [times] the power of killing bacteria
- Lower your bromine use up to 50% with [FROG] minerals
- Just set it and forget it for weeks at a time
- Experience the difference
- [Replace] [Upgrade] your old bromine technology [with Fresh Mineral Water]
- Spa Frog is now Frog Serene

King Technology: Spa Bromine Disinfectant Label Revision: March 19, 2018 Page 11 of 13

{All text on this page is Optional}

- Oxi-King Water Treatment System
- The precise No Touch Chemical Feeder
- An easy, [consistent] and reliable delivery system that provides simple water treatment [solutions] for industrial and commercial applications.
- Sustainable water treatment solution
- Controls system fouling
- Quick, universal installation works with multiple applications
- Simple. Reliable [consistent] results.
- Consistent, sustainable and reliable results.
- The choice is easy, chose Oxi-King Water treatment system
- [Oxi-King] Saves you valuable time and money
- Easy to use. Easy to transport [carry][handle]
- Saves you valuable time with pre-filled, no touch [Oxi-King] Brom Pacs
- [Significantly] [drastically] reduces [hazardous] bromine dust
- Reduces exposure to [hazardous] bromine dust
- [Easier] [Better] for employees to handle.
- [Better] for the environment. [Better] [Advantageous] for your employees.
- Eliminates the need for Haz-Mat suits.
- Pre-filled bromine pacs eliminate hazardous material handling concerns [bromine dust]
- [Unique] [Proprietary] Dust-free packaging [design]
- No risk of liquid spills or splashing
- Reliable: Water cycles through only a small amount of bromine for more uniform and reliable output
- No drum or pail disposal
- Facility-friendly dust free packaging [that has less odors] [that has less odors than traditional sanitizing methods]
- Less odors
- The easier alternative to bulk bromine
- Reduced odors and no touching or measuring bromine
- Saves time bromine lasts longer
- No hassles no contact with bromine the [cartridge] [pac] [chamber] contains the odors
- Facility friendly
- Proprietary solid oxidizing biocide delivery system provides simple water treatment for industrial and commercial applications
- Bromine based chemistry provides broad spectrum microbiological control including Legionella pneumophila
- [Oxi-King Brom Pacs are] 100% recyclable

King Technology: Spa Bromine Disinfectant Label Revision: March 19, 2018 Page 12 of 13

{All text on this page is Optional}

- Replace Brom Pac when empty
- Open cap and remove empty pac recycle or dispose in trash
- Remove handle from new Brom Pac with tool provided and insert into system
- Set dial to maintain desired bromine output [level] [levels]
- Bleed air from back knob if more output desired at maximum setting
- [Oxi-King] 5lb [Oxi-King] bromine pac
- While this system limits exposure to chemicals, EPA requirements state you should wear rubber gloves and safety glasses when using this product and avoid breathing in dust or fumes. Wash thoroughly after using this product.

King Technology: Spa Bromine Disinfectant Label Revision: March 19, 2018 Page 13 of 13