

SEP 20 2012

Ms Abigail Downs Agent for King Technology Inc Technology Sciences Group Inc 1150 18<sup>th</sup> Street, NW, Suite 1000 Washington, D C 20036

Subject Frog<sup>®</sup> Dichlor Pac EPA Registration No 53735-13 Application Date 07/02/2012 Receipt Date 07/03/2012

Dear Ms Downs

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable

#### **Proposed Amendment**

- o Modifications to Directions for Use
- o Update of optional language for manuals and packaging
- o Additional optional marketing claims

#### **General Comments**

The modifications to the directions for use, update of the optional language, and optional marketing claims are acceptable A stamped label is enclosed for your records Should you have any questions or comments concerning this letter, you may contact Jaclyn Carl by telephone at (703) 347-0213 or by e-mail at <u>carl jaclyn@epa gov</u> When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing

Sincerely aw

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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION [All text in braces {xxx} is optional and may or may not be included on a final label ] [All text in brackets [xxx] is administrative and will not appear on a final label ]

# [Master Label] FROG<sup>®</sup> Dichlor Pac

{Establish an initial chlorine level with precise feeding Wake up your pool with an initial chlorine level Step 2 of the 3 part Pool Wake Up! Convenience Pack Use with FROG Leap Pool Wake Up! for spring openings}

# KEEP OUT OF REACH OF CHILDREN DANGER

See {back} {side} panel for First Aid and additional precautionary statements

99 0%*
1 0%
100 0%

\*Available chlorine 55%

Distributed by King Technology, Inc 530 11<sup>th</sup> Avenue South Hopkins, MN 55343 www.kingtechnology.com

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King Technology Frog Dichlor Pac EPA Reg No 53735-13\_\_\_\_ Label Version December 19, 2011July 2, 2012 Page 1 of 78 **PRODUCT DESCRIPTION** This pre-filled, {disposable} {or} {recyclable} pac provides an effective and easy way to both start up a swimming pool in the spring {and {close,} {shut down} the pool {for the winter} {in the fall} Use FROG Dichlor Pac with the FROG Leap Mineral System for residential swimming pools up to {15,000} {20,000} {40,000} gallons it will establish an initial chlorine {level} {residual} by precisely feeding into the pool with no measuring or touching the chemical inside

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**DIRECTIONS FOR USE** It is a violation of Federal law to use this product in a manner inconsistent with its labeling

**(For Spring Start up ) (After balancing the pool water and inserting a new FROG Mineral** Reservoir (EPA Reg No 53735-11) and FROG Shock Pac into the FROG {System} {Cycler}, insert FROG Dichlor Pac using steps 1 through below }

{For {Winterizing} {Fall Closing} Before lowering the water level and discarding the used FROG Mineral Reservoir insert the FROG Dichlor Pac using steps 1 through  $\rightarrow$  below }

- 1 With the circulation system off {set the control dial to 0 and} remove the cap to the FROG Leap {System} {Cycler}
- 2 Remove caps from the FROG Dichlor Pac with a pliers or other suitable tool
- 3 Turn FROG Dichlor Pac over so open ends face down and insert into the center of the FROG Mineral Reservoir. The ends of the pac will align with an L shaped key in the {System} {Cycler} DO NOT FORCE
- 4 Replace cap on the {FROG Leap} {or} {POOL FROG} {System} {Cycler} {Infuzer} and set dial to Setting 5 Turn on pump and allow 1 hour for the {product} {Dichlor} {chlorine} to slowly dispense into the pool
- 5 If after 1 hour the pac still contains some ingredient, re-insert, replace cap and run the circulation for an additional 30 minutes
- 6 Remove the empty FROG Dichlor Pac and discard or recycle
- 7\_Replace cap on {FROG Leap} {or} {POOL FROG} {System} {Cycler} {Infuzer} and allow circulation to run at least 15 minutes before inserting any other FROG pac products
- 7.9 Repeat steps 1.7 if additional FROG Dicolor Plac is required

**FIRST AID If in eyes** Hold eye open and rise 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 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 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

## IN CASE OF MEDICAL EMERGENCY, CALL 1-800-424-9300

## 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 Wear goggles, face shield or safety glasses Avoid breathing dust and fumes. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

**PHYSICAL AND CHEMICAL HAZARDS** STRONG OXIDIZING AGENT Do not refill empty {container} {pac} Do not mix with other chemicals Never add water to product Always add product to large quantities of water Mix only into water using clean dry utensils Contamination with moisture, organic matter, or other chemicals may start a chemical reaction and generate heat, hazardous gas, possible fire and explosion Do not use this product to any dispensing device which has been used with any inorganic or unstabilized chlorinating compounds (e.g., calcium hypochlorite) Such use may cause a violent reaction leading to fire or explosion

[Environmental hazards statement for end use products of less than 50 pounds (solid, dry weight) ]

**ENVIRONMENTAL HAZARDS** This pesticide is toxic to fish and aquatic organisms

**STORAGE AND DISPOSAL** Store {container} {pac} in a cold, dry, well ventilated area away from heat or open flame Moisture may decompose this product and cause a violent reaction leading to fire and explosion. In case of decomposition, isolate {container} {pac}, if possible and flood with large amounts of water to dissolve all material before discarding this {container} {pac}. Do not contaminate food or feed by storage or disposal Container} {pac}. Non-refillable container. Do not reuse or refill this {container} {pac}. Offer for recycling if available. Rinse thoroughly before recycling or discarding in trash.

Important The warranty will be void if this pac is not used with the appropriate FROG-Leap {System} {Cycler} Fire or explosion may result if this pac is used with an incorrect {system} {cycler}

{Note Some settling may occur during shipment }

{DO NOT REMOVE LABEL }

{NPTN hotline number for public information 1-800-858-7378}

{Note Buyer assumes all responsibility for safety and use not in accordance with directions }

# [All text on this page optional language for manuals and packaging]

Frog Leap Pool Wake Up<sup>1</sup> Operation Instructions For Spring Openings

It's as easy as Ready, Set, Go!

Frog Leap Depth Charge Ready Start by removing contaminants to keep water crystal clear

Frog Leap Reveille Set Then set your chlorine level

Frog Leap All-Out

Go Then prevent algae with a 90 day algae protection guarantee (see website below for guarantee details)

1 Frog Leap Depth Charge After balancing the pool water and inserting a new Frog Leap Anti-Bac Mineral Pac into the {Frog Leap} {or Pool Frog} {System} {Cycler} {Infuzer}, insert Frog Leap Depth Charge using steps 1 through 78

WATER BALANCE GUIDELINES	
[ pH	7 2-7 8
Total Alkalınıty	60-120 ppm
Calcium Hardness	150-400
Total Dissolved Solids	<1500
Stabilizer (Cyanuric Acid)	20-80 ppm
Free Chlorine	0 5-1 0 ppm

1 With the circulation system off, set control dial to <u>{Setting 0} {Minimum} {Pac</u> <u>Removal</u> {or} {Off} {depending on the model} {lowest setting} and remove the cap to the \_{Frog Leap} {or Pool Frog} {System} {Cycler} {Infuzer}

2 Remove caps from Frog Leap Depth Charge with a pliers or other suitable tool

3 Turn Frog Leap Depth Charge over so open ends face down and insert into the center of the Frog Leap Anti-Bac Mineral Pac. The ends of the pac will align with an L-shaped key in the system DO NOT FORCE

4 Replace cap on {Frog Leap} {or Pool Frog} {System} {Cycler} {Infuzer} and set dial to {setting  $5 \leq 1 \leq n \leq 1$ }  $\{O_1 \leq n \leq 1 \leq n \leq 1$ }

5 Turn on pump and allow 1 hour for the product to slowly dispense into the pool If after 1 hour, the pac still contains some ingredient, reinsert, replace cap and run the circulation for an additional 30 minutes <u>{1 Hour Dispensing} {Dispenses in 1</u> <u>hour}</u>

6 Remove the empty Frog Leap Depth Charge and discard or recycle 7 Replace cap on {Frog Leap} {or Pool Frog} {System} {Cycler} {Infuzer} and allow circulation to run at least 15 minutes before inserting any other Frog Leap products

7-8 Repeat steps 1-7 if additional Frog Leap Depth Charge is required

# [All text on this page \_ optional language for manuals and packaging]

#### 2 Frog Leap Reveille

Dispense Frog Leap Reveille to establish your initial chlorine level in the pool following the same steps 1 through 78 for Frog Leap Depth Charge

#### 3 Frog Leap All-Out

Wait 24 hours a After Frog Leap Depth Charge and Frog Leap Reveille to have dispensed, test the water before adding Frog Leap All-Out for a 90 day algae protection guarantee. When the pH is between 7 2 and 7 8 and the chlorine level is no more than 4.0 ppm, following steps 1-7.8 below

1 Turn off pump and turn dial to {Setting 0} {Minimum} {Pac Removal} {or} {Off} {depending on the model} {lowest setting} and remove cap from the {Frog Leap} {or Pool Frog} {System} {Cycler} {Infuzer}

2 Remove cap from Frog Leap All-Out without removing seal NOTE Avoid adding other chemicals und! this product has been-circulated (filtered) for at least 24 hours,

3 Insert upside down into center of Frog Leap Anti-Bac Mineral Pac pushing down firmly on key to puncture seal

4 Replace cap by hand only DO NOT OVERTIGHTEN Turn control dial to {Setting 5} {Maximum} {or} {On}

**5** Turn pump on for 90 minutes allowing Frog Leap All-Out to circulate through pool

6 To remove Frog Leap All-Out turn pump off, turn dial to <u>{Setting 0}, {Minimum</u>} {Pac Removal} {or <u>Off</u>} <u>{depending on the model} {lowest setting}</u> <u>and remove</u> system cap

7 Lift Frog Leap All-Out up and allow any water in the container to drain through the system before recycling or discarding in trash NOTE If water shows more than a hint of blue inside {Frog Leap} {or Pool Frog} {System} {Cycler} {Infuzer}, replace the cap, turn dial to {Setting 5} {Maximum} {or} {On} {depending on the model} and run the pump for one minute

7a8 If pool size requires additional Frog Leap All-Out, repeat steps 1-7 <u>NOTE</u> <u>Avoid adding other chemicals until this product has been circulated (filtered)</u> for at least 24 hours

After using Frog Leap Pool Wake Up!, insert your Frog Leap Torpedo Pac for continuous lowchlorine maintenance for weeks at a time

Use only the factory recommended prefilled price inside the Pool Frog or FROG Leap System

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Frog Leap Pool Hibernation Operation Instructions For Fall Closings

The 1-2 Winterizing Punch!

• Frog Leap Depth Charge removes contaminants {to keep water crystal clear} <u>Dispenses in 1 hour</u>

Before lowering the water level and discarding the used Frog Leap Anti-Bac Mineral Pac, insert Frog Leap Depth Charge using steps 1 through 78

 Frog Leap All-Out prevents algae <u>{throughout the winter long}</u> <u>{to prepare</u> the pool for a {smoother spring start-up} <u>{worry free summer}</u> <u>Dispenses in 90</u> minutes

<u>If pH is balanced and the chlorine level is under 4.0 ppm, Wait-24 hours after Frog Leap</u> Depth Charge to dispense Frog Leap All-Out algae preventative following steps 1-78

US\_Patent Numbers ## and other US\_and Foreign\_patents\_pending

# [All text on this page optional marketing language]

Sets {Establishes} a chlorine {residual} {level} in the pool {prior to adjusting} {to help find the} precise dial setting for the FROG Leap {System} {Cycler}

Uniquely dispenses through the FROG Leap {System} {Cycler}

Use with FROG Shock Pac {Frog Leap Depth Charge} and FROG BAM {for complete pool opening, start-up} {to awaken, wake up your pool}

Convenience Pack for Spring Start-up

Leap into Summer! Wakes up your pool in a snap!

Use the FROG Shock Pac {Frog Leap Depth Charge}, the FROG Dichlor Pac and FROG BAM Algae Preventative for an easy 3 step start up program that uniquely feeds through the FROG Leap {System} {Cycler}

Prepare your pool for a fun summer ahead!

Ensure a worry free summer with proper start up

Always start you summer with a new FROG Leap Mineral Reservoir Then it's time for {Wake Up} {Awakening} {Awake}

It's as easy as {1, 2 3} {A B C} {Ready, Set, Go}

After using the {Wake Up} {Awakening} {Awake} Kit insert your FROG Leap Bac Pac for continuous low chlorine maintenance for weeks at a time

Allow 1 hour for Frog Leap Depth Charge {to slowly dispense into the pool} Allow 1 hour for Frog Dichlor Pac {to slowly dispense into the pool}

Convenience Pack for Fall Closing{s}

Puts your pool to sleep for the {winter} {off season}

Use the {FROG Shock Pac} {Frog Leap Depth Charge} and {FROG BAM} {Frog Leap All-Out} Algae Preventative for an easy 2 step {winterizing} {fall closing} {fall shut down} program that uniquely feeds through the FROG Leap {System} {Cycler}

Before lowering the water level and discarding the Frog Leap Anti-Bac Mineral Pac, its time for Frog Leap Depth Charge

Easy 2 Step {Fall} {Winter} Closing {Program} {System}!

Prepare your pool for a smoother spring start up!

Ensure a worry free off season as your pool sleeps away the winter months

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[All text on this page , optional marketing statements]

The worry free way to winterize your pool

The 1 – 2 {Winterizing} {Fall Closing} {Hibernation} Punch

The Essential FROG Leap Pool {Start-up} {Opening} {Winterizing} {Closing} {Shut Down} Kit

For Optimal {Optimum} Performance of the FROG Leap System!

Specially packaged for FROG Leap Mineral System users

No Guess, No Mess, No Stress

No mixing, no measuring, no touch

{Get the most from your Frog Leap Mineral System} {Maximize your mineral benefits} with the FROG Leap {Wake Up} {and} {Hibernation} Kit{s}

FROG Shock Pac {Frog Leap Depth Charge} {removes contaminants}
 Start by {oxidizing} {cleansing}
 {Install} {Use} {Dispense} the FROG Shock Pac {Frog Leap Depth Charge} {per the directions on the label} to {remove} {oxidize} {eliminate} contaminants
 After inserting a new FROG Mineral Reservoir it s time for FROG Shock Pac {Frog Leap Depth Charge}

FROG Dichlor Pac {sets your chlorine {residual} {level}} Then {Set} {Establish} your {initial} chlorine {residual} {level} {Install} {Use} {Dispense} the FROG Dichlor Pac {per the directions on the label} to establish a chlorine {residual} {level} Use this to determine your Cycler dial setting to ensure you are maintaining the 0 5 to 1 0 ppm level used with the FROG Leap Mineral System After fully dispensing FROG Shock Pac {Frog Leap Depth Charge} run the pool circulation for 15 minutes before inserting FROG Dichlor Pac

FROG BAM prevents algae {for 90 days} {Guaranteed!} {all} {through} {during} {the} {winter} Then Prevent Algae with a 90 day algae protection guarantee
Wait 24 hours after After {FROG Shock Pac} {FROG Dichlor Pac} to {install} {use} {dispenses} test the water before adding FROG BAM {per the directions on the label} for a 90 day algae protection guarantee! Prevents algae for a cleaner, clearer pool Prevents algae {all winter long} {during the winter}

All {FROG Leap} {Pool Wake Up!} {Pool Hibernation} components are recyclable {when finished dispensing for a responsible solution to pool care}

FROG says recycling your kit products after use is the responsible thing to do! Easy 3 Step Pool Start Up {Program} {System}!

For residential pools up to  $\{15,000\}$   $\{20,000\}$   $\{40,000\}$  qallons  $\{Mineral pool c ue to it s\}$  this Frogram that a Leap ahead!

Adopt a FROG for Wd Free Water