



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

January 10, 2024

Perri Moeller
Regulatory Consultant
King Technology, Inc.
c/o Technology Sciences Group
Electronic Transmittal: perri.moeller@tsgconsulting.com

Subject: Label Amendment – Application to Revise Label’s Use Directions.
Product Name: “Frog Dichlor Pac”
EPA Registration Number: 53735-13
Received Date: September 21, 2022
Action Case Number: 00394957

Dear Ms. Moeller:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), 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. Pursuant to 40 CFR 156.10(a)(6) 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 FIFRA and is subject to review by the Agency. See FIFRA section 2(p)(2). 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) lists 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, FIFRA section 12(a)(1)(B). 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 Assurance.

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 Michael Varco by phone at 202-566-0667, or via email at Varco.Michael@epa.gov.

Sincerely,

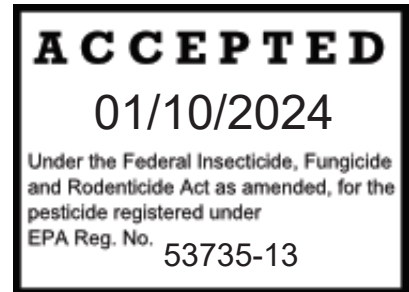
A handwritten signature in black ink, appearing to read "D. Fuller", with a long horizontal stroke extending to the right.

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

Enclosure: Master product label

[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® Dichlor Pac



{Establish {a} {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}
{The first step to a {clean} {clear} {sparkling} {hot tub} {swim spa}}
{Start-up for a freshly filled {hot tub} {swim spa}}

KEEP OUT OF REACH OF CHILDREN
DANGER

{See additional precautionary statements on {back} {side} panel.}
{See enclosed manual and product label for complete directions for use}

Active Ingredient:

Sodium dichloro-s-triazinetriene dihydrate.....99.0%*
Other Ingredients:.....1.0%
Total.....100.0%

*Available chlorine 55%

{Manufactured for:}

King Technology, Inc.
6000 Clearwater Dr
Minnetonka, MN 55343

EPA Reg. No.: 53735-13
EPA Est. No.: xxxxx-xxx
Net Wt.: _____

[Note to Reviewer: In accordance with 40 CFR 156.68(d), all first aid statements, as prescribed, will appear on the front panel of the product label.]

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 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: This pre-filled {pac} {pouch} {packet} {bag} 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}} {hot tub} {swim spa} when filling with fresh water}. Use FROG Dichlor Pac with the {Brand Mineral System} for residential {swimming pools up to {15,000} {20,000} {40,000} gallons} {hot tubs up to 600 gallons} {swim spas up to 3000 gallons}. It will establish an initial chlorine {level} {residual} {by precisely feeding into the pool} {by cutting the corner and pouring into the {hot tub} {swim spa}} with no measuring or touching the chemical inside.

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

[Option 1: For use in swimming pools using the {Brand System}]

{For Spring Start up:} {After balancing the pool water and inserting a new {53735-11 Brand Name} and {Shock Pac Brand Name} into the {Brand System}, insert FROG Dichlor Pac using steps 1 through 8 {below}.

{For {Winterizing} {Fall Closing}: Before lowering the water level and discarding the used {53735-11 Brand Name} {and after dispensing the {Shock Pac Brand Name}, run the pool circulation for 15 minutes and then} insert the FROG Dichlor Pac using steps 1 through 8 {below}.

1. With the circulation system off, {set the control dial to {0} {the lowest setting} and} remove the cap to the {Brand System}.
2. Remove caps from 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 {53735-11 Brand Name}. The ends of the pac will align with an L shaped key in the {Brand System}. DO NOT FORCE.
4. Replace cap on the {Brand System} and set dial to Setting {5} {10}. 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 {Brand System} and allow circulation to run at least 15 minutes before inserting any other FROG products.
8. Repeat steps 1-7 if additional FROG Dichlor Pac is required.

[Option 2: For use in hot tubs or swim spas]

1. For best results make sure the water is balanced with pH between 7.2 and 7.8, Total Alkalinity between 80 and 120 and Total Hardness between 150 and 250.
2. Start by turning on the {hot tub} {swim spa} circulation system and running the jets.
3. Cut the corner of the {pouch} {packet} {bag} at the cut line.
4. While the jets are running, pour entire contents into the {hot tub} {swim spa}.
5. Continue to run the jets for 15 minutes.

STORAGE AND DISPOSAL:

Do not contaminate food or feed by storage or disposal.

Storage: Store {container} {pac} {pouch} {packet} {bag} 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} {pouch} {packet} {bag}, if possible and flood with large amounts of water to dissolve all material before discarding this {container} {pac} {pouch} {packet} {bag}.

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 Disposal: Non-refillable container. Do not reuse or refill this {container} {pac} {pouch} {packet} {bag}. Offer for recycling if available. Rinse thoroughly before recycling or discarding in trash.

PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: DANGER: Corrosive: Causes irreversible eye damage. Causes skin burns. 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.

{Important: The warranty will be void if this {container} {pac} {pouch} {packet} {bag} is not used with the appropriate FROG {System} {Cycler}. Fire or explosion may result if this {container} {pac} {pouch} {packet} {bag} 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: To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with directions.}

[Operation Manual for Co-Pack of 53735-9 and 53735-13 - All text on this page is optional language]

{Co-pack of 53735-9 and 53735-13 Brand Name} Operation{al} Instructions

{It's as easy as Ready, Set, Go!}
{The 1-2 Winterizing Punch!}

{Shock Pac Brand Name}

1. Ready: {Start by} remov{ing}{es} contaminants to keep water crystal clear

FROG Dichlor Pac

2. Set: {Then} set your {initial} chlorine level

{53735-9 Brand Name}

3. Go: {Prevents algae {for 90 days} {all winter long} {throughout the winter} {to prepare the pool for a {smoother spring start-up} {worry-free summer}.} {Then prevent algae with a} 90-day algae protection guarantee (see kingtechnology.com {frogproducts.com} {below} for guarantee details)

{For Spring {Openings} {Start-up}: After balancing the pool water and inserting a new {53735-11 Brand Name} into the {Brand System}, follow steps 1 through 3 to start-up the pool.}

WATER BALANCE GUIDELINES	
pH	7.2-7.8
Total Alkalinity	80-120 ppm
Calcium Hardness	200-400
Total Dissolved Solids	<1500
Stabilizer (Cyanuric Acid)	{20} {30}-{50} {80} ppm
Free Chlorine when using FROG Minerals	0.5-1.0 ppm

{For Fall Closings: Before lowering the water level and discarding the used {53735-11 Brand Name}, follow steps 1 through {2}{3} to winterize the pool.}

1. Start with {Shock Pac Brand Name}

1. With the circulation system off, set control dial to {Setting 0} {Minimum} {Pac Removal} {or} {Off} {depending on the model} {the lowest setting} and remove the cap to the {Brand System}.
2. Remove caps from {Shock Pac Brand Name} with a pliers or other suitable tool.
3. Turn {Shock Pac Brand Name} over so open ends face down and insert into the center of the {53735-11 Brand Name}. The ends of the pac will align with an L-shaped key in the system. DO NOT FORCE.
4. Replace cap on {Brand System} and set dial to {setting {5} {10}} {the highest setting} {Maximum} {or} {On} {depending on the model}.
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. {1 Hour Dispensing} {Dispenses in 1 hour}
6. Remove the empty {Shock Pac Brand Name} and discard or offer for recycling if available.

7. Replace cap on {Brand System} and allow circulation to run at least 15 minutes before inserting any other {Brand} products.
8. Repeat steps 1-7 if additional {Shock Pac Brand Name} is required.

2. Then add FROG Dichlor Pac

Dispense FROG Dichlor Pac to establish {your} {an initial} {a} chlorine level in the pool following the same steps 1 through 8 for {Shock Pac Brand Name}.

3. {2}{3} Lastly use {53735-9 Brand Name}

After {Shock Pac Brand Name} {and FROG Dichlor Pac} {have} {has} dispensed, test the water before adding {53735-9 Brand Name} for a 90-day algae protection guarantee {see kingtechnology.com} {frogproducts.com} for guarantee details}. When the pH is between 7.2 and 7.8 and the chlorine level is no more than 4.0 ppm, follow steps 1-8 {below}.

1. Turn off pump and turn dial to {Setting 0} {Minimum} {Pac Removal} {or} {Off} {depending on the model} {the lowest setting} and remove cap from the {Brand System}.
2. Remove cap from {53735-9 Brand Name} without removing seal.
3. Insert upside down into center of {53735-11 Brand Name} pushing down firmly on key to puncture seal.
4. Replace cap by hand only. DO NOT OVERTIGHTEN. Turn control dial to {Setting {5} {10}} {the highest setting} {Maximum} {or} {On}.
5. Turn pump on for 90 minutes allowing {53735-9 Brand Name} to circulate through pool.
6. To remove {53735-9 Brand Name}, turn pump off, turn dial to {Setting 0} {Minimum} {Pac Removal} {or} {Off} {depending on the model} {the lowest setting} and remove system cap.
7. Lift {53735-9 Brand Name} up and allow any water in the {container} {pac} to drain through the system before discarding in trash or offering for recycling if available. **NOTE: If water shows more than a hint of blue inside {Brand System}, replace the cap, turn dial to {Setting {5} {10}} {the highest setting} {Maximum} {or} {On} {depending on the model}. and run the pump for one minute.**
8. If pool size requires additional {53735-9 Brand Name}, repeat steps 1-7. **NOTE: Avoid adding other chemicals until this product has been circulated (filtered) for at least 24 hours.**

After using {Co-pack of 53735-9 and 53735-13 Brand Name}, insert your {53735-2 Brand Name} for continuous low-chlorine maintenance for weeks at a time.

Use only the factory recommended prefilled pacs inside the {Brand System} per the instructions. Do not use any other pac or bulk chemicals in the {Brand System}. Use of any other product could result in damage to pool equipment or surface, unsafe pool conditions, fire or explosion.

Patents: kingtechnology.com/IP
kingtechnology.com {frogproducts.com}

[All text on this page is optional marketing language]

{Sets} {Establishes} a chlorine {residual} {level} in the pool {prior to adjusting} {to help find the} precise dial setting for the {Brand System}.
Uniquely dispenses through the {Brand System}

Use with {Shock Pac Brand Name} and {53735-9 Brand Name} {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 {Shock Pac Brand Name}, the FROG Dichlor Pac and {53735-9 Brand Name} Algae Preventative for an easy 3 step start up program that uniquely feeds through the {Brand System}.

Prepare your pool for a fun summer ahead!
Ensure a worry-free summer with proper start up.

Always start you summer with a new {53735-11 Brand Name}. Then it's time for {Co-pack of 53735-9 and 53735-13 Brand Name}

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

After using the {Co-pack of 53735-9 and 53735-13 Brand Name}, insert your {53735-2 Brand Name} for continuous low chlorine maintenance for weeks at a time.

Allow 1 hour for {Shock Pac Brand Name} {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 {Shock Pac Brand Name} and {53735-9 Brand Name} Algae Preventative for an easy 2 step {winterizing} {fall closing} {fall shut down} program that uniquely feeds through the {Brand System}.

Before lowering the water level and discarding the {53735-11 Brand Name}, {it's time for {Shock Pac Brand Name}} {and after dispensing {Shock Pac Brand Name}}, run the pool circulation for 15 minutes and then insert FROG Dichlor Pac}.

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.

[All text on this page is optional marketing statements]

{The} worry-free way to winterize {your} pool{s}

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

The Essential {Brand} pool {Start-up} {Opening} {Winterizing} {Closing} {Shut Down} Kit.

For Optimal {Optimum} Performance of the {Brand System}!

Specially packaged for {Brand Mineral System} users.

{Pre-filled} {cartridges} {makes it easy.} {for}} No mess, no guess {and} no stress!
No mixing, no measuring, no touch

{Get the most from your Brand Mineral System} {Maximize your mineral benefits} with the
{Co-pack of 53735-9 and 53735-13 Brand Name}.

{Shock Pac Brand Name} {removes contaminants}

Start by {oxidizing} {cleansing}.

{Install} {Use} {Dispense} the {Shock Pac Brand Name} {per the directions on the label} to
{remove} {oxidize} {eliminate} contaminants.

After inserting a new {53735-11 Brand Name} it's time for {Shock Pac Brand Name}

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 {Brand System} dial setting to ensure
you are maintaining the 0.5 to 1.0 ppm level used with the {Brand Mineral System}.

After fully dispensing {Shock Pac Brand Name} run the pool circulation for 15 minutes before
inserting FROG Dichlor Pac.

{53735-9 Brand Name} prevents algae {for 90 days} {Guaranteed!} {all} {through} {during}
{the} {winter}

Then Prevent Algae with a 90-day algae protection guarantee.

After {Shock Pac Brand Name} {and} {FROG Dichlor Pac} dispenses test the water before
adding {53735-9 Brand Name} {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 {Co-pack of 53735-9 and 53735-13 Brand Name} components are recyclable {when
finished dispensing for a responsible solution to pool care}.

{Brand} 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} gallons

{Mineral pool care that's} {It's {Brand Name} but} a Leap ahead!

[All text on this page is optional marketing statements]

Convenient 3 Pack for {Spring Start-up} {Fall Closing}

Up to 15K gallons

Fits the following systems: {Brand Names}

Download the free {Brand} Water Care App {{from} {on} the App Store} {get it on Google Play}

Fresh Mineral Water

Easy as 1-2-3-Ahh...

Step 1 Minerals – {53735-11 Brand Name} (sold separately) Lasts 6 months or one pool season whichever is shorter.

Step {2} {3} Chlorine – {53735-2 Brand Name} (sold separately) Replace every 2-3 weeks throughout your swim season.

Step {3} {2} – Algae Protection {Co-pack of 53735-9 and 53735-13 Brand Name} (included in this box) Use once in the spring and again in the fall for optimal performance.

[For hot tub or swim spa packaging]

Fast and easy hot tub start-up

For hot tubs up to 600 gallons

For swim spas up to 3000 gallons

Cut here to open

Removes organic contaminants and establishes a chlorine level

For use with any {Brand} Sanitizing System for {hot tubs} {swim spas}

Helps take the load off the {Brand} Sanitizing System so cartridges last longer

Start-up a freshly filled {hot tub} {swim spa} easily and effectively

Optimizes the performance of {Brand} {hot tub} {swim spa} {products} {systems}

Download {the} free {Brand} {Water Care} App

Tap into the App – Watercare guide for {spas} {hot tubs} and pools

- Easy water testing advice
- Water care at your fingertips
- Helpful reminders and more

Expert advice, reminders & more

Simple water care at your fingertips

[Phone App Icon for FROG Dichlor Pac used with 53735-11 Brand Names]

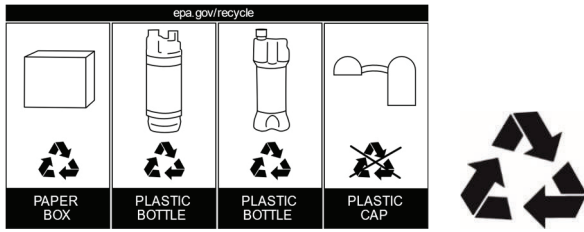


Download the **FREE**
FROG Water Care® App



[Recycling symbols for Frog Dichlor Pac Products]

[Note to reviewer: The following is a representative recycling image for Frog Dichlor Pac with other EPA registered products. Images will represent the appropriate product and recycling number. A simple recycling symbol may be used.



[The following images are representative of current products and may or may not appear on product labeling]



Option 1 for pools



Option 2 for hot tubs or swim spas