

54614-7

5-3-2000

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY - 3 2000

Wendy A. McCombie  
Lewis & Harrison  
122 C Street, NW Suite 740  
Washington, DC 20001

Subject: Purity Biochemical Inc.  
Spa Chlor  
EPA Registration No. 54614-7  
Resubmission Dated January 30, 2000

Dear Ms. McCombie:

*This resubmission was based on a January 12, 2000, Agency rejection letter of proposed labeling changes for this product. The issues to be addressed by the company included; identification of substantially similar products to support the claims; deletion of the bather waste terminology; removal of comparative statements; and correction of the free available chlorine range. The information provided in support of the claims was adequate and the deletions and corrections were performed as requested.*

*Therefore, the labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable subject to the comment below.*

*Please revise your label under the "First Aid" section to comply with PR Notice 2000-3 for this product.*

*In response to the issue of your revised Confidential Statement of Formula (CSF) dated September 13, 1999 for Spa Chlor. There is no indication in the file jacket or our regulatory system that we received the CSF, so if you could provide a copy of the revised CSF, we will attempt to expedite a review.*

CONCURRENCES							
SYMBOL	7570C						
SURNAME	Mitchell						
DATE	5-3-00						

*A stamped copy of your labeling is enclosed for your records. One copy of the finished labeling must be submitted prior to releasing the product for shipment bearing the amended label.*

*If you have any questions concerning this letter, please contact Wanda Mitchell at (703) 308-6264.*

*Sincerely,*



*Robert S. Brennis  
Product Manager 32  
Regulatory Management Branch II  
Antimicrobials Division (7510C)*

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# SPA CHLOR™

- [Stabilized Chlorinating Granules]<sup>1</sup>
- [Stabilized Granular Chlorinating Concentrate]<sup>1</sup>
- [Protects Against Odor]<sup>1</sup>
- [Kills and]<sup>1</sup> Controls Bacteria and Algae [In Spas]<sup>1</sup> [In Your Hot Tub]<sup>1</sup> [In Swimming Pools]<sup>1</sup>
- [Designed to rid your hot tub of human waste and build-up of chloramines/combined chlorines<sup>4</sup> and other chemicals.]<sup>1</sup>

ACTIVE INGREDIENT:

Sodium dichloro-s-triazinetrione..... 99.0%

INERT INGREDIENTS..... 1.0%

TOTAL ..... 100.0%

Available Chlorine: 62.0%

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**

See Side Panel For Additional Precautionary Statements

Net Weight [Contents] \_\_\_ lbs. [ \_\_\_ oz.]

[SPA PRODUCT] [POOL PRODUCT]

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

MAY - 3 2000

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 54614-7

**SPA CHLOR MASTER LABEL/ NOTES TO THE REVIEWER**

[Bracketed, italicized text denotes alternate marketing language or directions for use, which will appear on the product label, based on package size and brand name.]

- 1 = Alternate marketing language or terminology
- 2 = Only on containers weighing 50 lbs. or more
- 3 = The terms "superchlorination" and "shock treatment" can be used interchangeably.
- 4 = "Chloramine" and "combined chlorine" are equivalent terms.
- 5 = pH PLUS and pH MINUS are pool products used to raise and lower the pH of the pool water.
- 6 = SUNSCREEN is a pool water stabilizer that helps reduce chlorine loss caused by the dissipating effects of sunlight.
- 7 = BLAST OUT and ULTRASHOCK are approved alternate brand names for the EPA-registered 68% calcium hypochlorite product, TRUE SHOCK (EPA Reg. No. 54614-11).

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SIDE PANEL

**FIRST AID:**

**If Swallowed:** Drink promptly large quantities of water. Do NOT induce vomiting. Avoid alcohol.

**If In Eyes:** Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.

**If On Skin:** Wash with plenty of soap and water. Get medical attention if irritation persists.

**If Inhaled:** Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

**Note To Physician:** probable mucosal damage may contraindicate the use of gastric lavage. Get medical attention.

**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 the 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, protective clothing and rubber gloves when handling this product. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

**[ENVIRONMENTAL HAZARDS:** This pesticide product is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other 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 local sewage treatment plant authority. For guidance contact your State water board or Regional Office of EPA.]<sup>2</sup>

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
MAY 3 2000

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**SPA CHLOR MASTER LABEL/ NOTES TO THE REVIEWER**

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READ THE ENTIRE LABEL BEFORE USING

BACK SIDE PANEL  
with...  
in EPA Letter Dated:

MAY - 3 2000

**DIRECTIONS FOR USE**

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

Under the Federal Law, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 54614-7

**PROFESSIONAL SPA TREATMENT**

SPA CHLOR is a granular combination clarifier and oxidizer designed to superchlorinate/shock treat<sup>3</sup> your spa or hot tub to eliminate human waste, remove build-up of chloramines/combined chlorines<sup>4</sup> and other chemicals and control bacteria and algae.

Use SPA CHLOR to superchlorinate/shock treat<sup>3</sup> your spa or hot tub once a week during periods of normal or moderate usage.

Use SPA CHLOR to superchlorinate/shock treat<sup>3</sup> your spa or hot tub on a daily basis during periods of heavy usage and hot weather, following high winds and rainstorms or when the water becomes cloudy or malodorous.

**IMPORTANT NOTE:** Spa or hot tub should not be entered after superchlorination/shock treatment<sup>3</sup> with SPA-CHLOR until the free available chlorine level reaches 1 - 3 ppm, as determined by an appropriate test kit. Entry into treated spas and hot tubs is prohibited at chlorine levels above 3 ppm.

**APPLICATION:** Remove cover from spa or hot tub and empty the contents of one 1.8 oz package for every 450 gallons of water into the center of your spa or hot tub with the jets on full speed. Allow pump to circulate at low speed for a minimum of 30 minutes before replacing cover. Maintain a free available chlorine level between 4-5 ppm while the spa or hot tub is not in use.]

<OR, ALTERNATE DIRECTIONS FOR SPA/HOT TUB USE:>

**PROFESSIONAL SPA TREATMENT**

SPA CHLOR is a combination disinfectant and algaecide that reacts instantly in the water to ensure that your spa or hot tub is bacteria and algae-free.

Use SPA CHLOR to superchlorinate/shock treat<sup>3</sup> your spa or hot tub once a week during periods of normal or moderate usage.

Use SPA CHLOR to superchlorinate/shock treat<sup>3</sup> your spa or hot tub on a daily basis during periods of heavy usage and hot weather, following high winds and rainstorms or when the water becomes cloudy or malodorous.

**IMPORTANT NOTE:** Spa or hot tub should not be entered after superchlorination/shock treatment<sup>3</sup> with SPA-CHLOR until the free available chlorine level reaches 1 - 3 ppm, as determined by an appropriate test kit. Entry into treated spas and hot tubs is prohibited at chlorine levels above 3 ppm.

**APPLICATION:** Persistent foaming and cloudy or malodorous water are potential indicators of inadequate sanitizer levels. To correct, remove cover from your hot tub and add 1 oz. per 250 US gallons of SPA CHLOR to your spa or hot tub while jets are on high speed. Allow pump to circulate for 30 minutes before replacing cover. Maintain a free available chlorine level between 4 - 5 ppm while the spa or hot tub is not in use.]

<OR, ALTERNATE DIRECTIONS FOR SPA/HOT TUB USE:>

**SPA CHLOR MASTER LABEL/ NOTES TO THE REVIEWER**

Page 3 of 6- 01/30/2000

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**PROFESSIONAL SPA TREATMENT**

SPA CHLOR is a stabilized granular chlorinating concentrate, which kills and controls bacteria and algae in spas and hot tubs.

**SPA AND HOT TUB USE:** Each level teaspoon will provide approximately 1.4 ppm available chlorine in 500 gallons of water. Using an appropriate test kit, test and adjust the water to the following values:

pH:	7.2 - 7.8
Total availability:	60 - 100 ppm
Calcium hardness:	200 ppm minimum

Maintain these conditions for spa and hot tub operation by frequent testing with an appropriate test kit. Do not allow cyanuric acid level to exceed 150 ppm. It is recommended that spas and hot tubs be drained every 30 to 90 days, more often under heavy use. Consult manufacturer's recommendation concerning the compatibility of chlorine sanitizers with their equipment. Some oils, lotions, fragrances, cleansers, etc. may cause foaming or cloudy water and may react with chlorine sanitizers to reduce their efficacy.

Use SPA CHLOR to superchlorinate/shock treat<sup>3</sup> your spa or hot tub once a week during periods of normal or moderate usage. Superchlorinate/shock treat<sup>3</sup> your spa or hot tub with SPA CHLOR on a daily basis during periods of heavy usage and hot weather, following high winds and rainstorms or when the water becomes cloudy or malodorous.

**IMPORTANT NOTE:** Spa or hot tub should not be entered until the free available chlorine level reaches 1 - 3 ppm, as determined by an appropriate test kit. Maintain a 1 - 3 ppm free available chlorine level while the spa or hot tub is in use. Entry into treated spas/tubs is prohibited at chlorine levels above 3 ppm.

**START UP (FRESHLY FILLED):** Turn on circulation system and ensure that it is operating properly. Add 5 teaspoons of SPA CHLOR for each 500 gallons of water. Check the free available chlorine level using an appropriate test kit. If the level is below 4 - 5 ppm, repeat addition of SPA CHLOR to reach this level while the spa or hot tub is not in use.

**REGULAR USE:** Turn on the circulation system and ensure that it is operating properly. Scatter approximately 2 1/2 teaspoons of the product per 500 gallons over the surface of the water. Always use a clean dry spoon. Test the free available chlorine levels. Maintain a 1 - 3 ppm free available chlorine level while the spa or hot tub is in use and a 4 - 5 ppm free available chlorine level while the spa or hot tub is not in use. If necessary, add additional SPA CHLOR to reach the appropriate levels. After each use, superchlorinate/shock treat<sup>3</sup> with 10 teaspoons of SPA CHLOR per 500 gallons water to control odors and algae and repeat as needed.

**EXTENDED NON-USE PERIOD:** During extended periods when the spa or hot tub is not being used, add 7 1/2 ounces of SPA CHLOR per 500 gallons of water twice a week with the circulation system running or as needed to maintain a 1 - 3 ppm level of free available chlorine. }

<OR ALTERNATE DIRECTIONS FOR POOL USE:>

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

MAY - 3 2000

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MAY - 3 2000

SIDE PANEL

**PROFESSIONAL POOL TREATMENT**

SPA CHLOR is a granular stabilized chlorinating concentrate, which kills and controls bacteria and algae in swimming pools.

Under the Federal Insecticide  
Fungicide and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 54614-7

**IMPORTANT NOTE:** Pool should not be entered until the free available chlorine level reaches 1 - 3 ppm, as determined by an appropriate test kit. Maintain a 1 - 3 ppm free available chlorine level while pool is in use. Entry into treated pools is prohibited at chlorine levels above 3 ppm.

**START UP (FRESHLY FILLED):**

1. Using an appropriate test kit, test the pH of the water before treatment. Adjust and maintain the pH within a range between 7.2 - 7.8 by using pH PLUS or pH MINUS according to the directions on the product labels.
2. To establish an initial 1 - 3 ppm free available chlorine level add 11 - 22 ounces of SPA CHLOR per 10,000 gallons of pool water. Broadcast SPA CHLOR evenly over the pool surface for maximum effectiveness.

**REGULAR POOL CARE:**

Maintain proper free available chlorine levels, as determined by an appropriate testing kit. A 1 - 3 ppm free available chlorine level should be maintained while the pool is in use. A 3 - 5 ppm free available chlorine level should be maintained while the pool is not in use.

1. Using an appropriate test kit, test pH and chlorine levels daily. Adjust and maintain the pH within a range between 7.2 - 7.8 by using pH PLUS or pH MINUS<sup>5</sup> according to the directions on the product labels.
2. For outdoor pools, chlorine residuals can be protected from destruction by the sun's rays, by increasing the stabilizer to 25 - 60 ppm with SUNSCREEN<sup>6</sup> according to the directions on the product label.
3. Maintain proper chlorine residual by broadcasting over pool's surface 1.0 - 3.0 oz of SPA CHLOR per 10,000 gallons of pool water, daily or as needed. Broadcast SPA CHLOR evenly over the pool surface for maximum effectiveness. Hot weather, heavy pool usage, high winds and rain may require higher usage rates to maintain proper chlorine residuals. If necessary, add additional SPA CHLOR to maintain the appropriate free available chlorine levels, as determined by an appropriate testing kit.
4. SPA CHLOR contains a stabilizer that may accumulate in pool water. Keep stabilizer in the range of 30-100 ppm by dilution with fresh water.

**SHOCK TREATMENT/SUPERCHLORINATION<sup>3</sup>:**

As a preventative treatment, shock treat/superchlorinate<sup>3</sup> pool water once per week. Shock treatment/superchlorination<sup>3</sup> of pool water is also recommended after heavy pool usage, hot weather, high wind and rains, or when the water becomes cloudy or malodorous.

1. Using an appropriate test kit, test the pH of the water before treatment. Adjust and maintain the pH within a range between 7.2 - 7.8 by using pH PLUS or pH MINUS according to the directions on the product labels.
2. Broadcast 11 - 22 oz of SPA CHLOR per 10,000 gallons of pool water evenly over pool's surface.

**<OR, ALTERNATE STEP 2 FOR POOL SUPERCHLORINATION/SHOCK TREATMENT>**

2. During periods of heavy pool usage and hot weather, high winds, rainstorms, or cloudy or malodorous water, daily superchlorination/shock treatment<sup>3</sup> of pool is recommended. A calcium hypochlorite product such as TRU SHOCK/BLAST-OUT<sup>7</sup> / ULTRASHOCK<sup>7</sup> should be used according to the directions on the product label for daily superchlorination/shock treatment<sup>3</sup> of your pool during such conditions.]

[For proper care and maintenance of your spa/hot tub, ask for PURITY's spa book "SPAS CLEAN & SIMPLE"]  
[For proper care and maintenance of your pool, ask for PURITY's pool book "POOLS CLEAN & SIMPLE"]

**SPA CHLOR MASTER LABEL/ NOTES TO THE REVIEWER**

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SIDE PANEL

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

**PHYSICAL AND CHEMICAL HAZARDS:** Strong oxidizing agent. Mix only with water. Use only thoroughly cleaned, dry utensils when handling this product. Do not add this product to any dispensing device containing remnants of any other products. Such use may cause a violent reaction leading to fire or explosion. Contamination with moisture, organic matter, or other chemicals may start a chemical reaction with generation of heat, liberation of hazardous gases, and possible generation of fire and explosion. In case of contamination or decomposition, do not reseal container. If possible, isolate each container in open air or well-ventilated area. Flood with large volumes of water if necessary.

**STORAGE AND DISPOSAL:** Keep product dry in a tightly closed container when not in use. Store in a cool, dry, well-ventilated area away from heat or open flame. Do not reuse empty container. Rinse empty container thoroughly with water to dissolve all material before discarding. Securely wrap container in several layers of newspaper and discard in trash.

**NOTICE TO BUYER:** Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions or under conditions not reasonable foreseeable to the seller, and buyer assumes the risk of any such use. Seller disclaims all other warranties, expressed or implied, including any warranty of FITNESS or MERCHANTABILITY.

**PURITY – “CLEAN & SIMPLE”**

Manufactured for:  
**PURITY BIOCHEMICAL INC.**  
13450 76<sup>th</sup> AVENUE  
SURREY, BRITISH COLUMBIA  
V3W 7P8 CANADA

EPA Reg. No. 54614-7  
EPA Est. No. 54614-CN-1

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