



Office of Pesticide Programs

May 29, 2008

Georgia Anastasiou
Lewis & Harrison
122 C Street, NW
Suite 740
Washington, DC 20001

Subject: Beachcomber Hot Tubs Plus, Inc.
SpaChlor
EPA Reg. No. 54614-7
Submission Dated: March 3, 2008
Receipt Date: March 3, 2008

Dear Ms. Anastasiou:

The labeling for the product referred to above submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended (FIFRA) is acceptable subject to the comment/condition listed below.

- Add the Environmental Hazard Statement for less than 50 pound containers.
- Revise the Container language in accordance with PR Notice 2007-4

Condition

Revise the Ingredient Statement as follows:

Active Ingredient:	
Sodium dichloro-s-triazinetrione	99.0%
Other Ingredients:	<u>1.0%</u>
Total:	100.0%

General Comments

A stamped copy of the labeling accepted with a condition is enclosed. Submit one copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

2 8 8

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

Sincerely,

Emily H. Mitchell
Product Manager – Team 32
Regulatory Management Branch II
Antimicrobials Division (7510P)

Master Label SPA CHLOR™ (Basic Product Name)

- [Stabilized Chlorinating Granules]
- [Stabilized Granular Chlorinating Concentrate]
- [Protects Against Odor]
- [Kills and] Controls Bacteria and Algae [growth] [in [Spas], [Hot Tubs], [Swimming Pools] [Swimming Pool Water]
- [Kills and] Controls Bacteria and Algae [growth] [in your [Spa], [Hot Tub], [Swimming Pool]
- [Designed to rid your hot tub of human waste and build-up of chloramines/combined chlorines and other chemicals.]
- [Clean and Simple]
- [for [spas] [pools] [swimming pools] [hot tubs]
- [Treatment]
- [Beachcomber Hot Tubs Logo][Purity Pool Products Logo]
- [Pools]

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] [Back] [Right] [Left] Panel For Additional Precautionary Statements

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

[SPA PRODUCT] [HOT TUB PRODUCT] [POOL PRODUCT]

ACCEPTED
with COMMENTS
EPA Letter Dated:

MAY 29 2008

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

(Note to reviewer: Boxed format or bullets may be used in First Aid section if label space permit)

FIRST AID:	
If Swallowed:	<ul style="list-style-type: none"> • Call a 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.
If In Eyes:	<ul style="list-style-type: none"> • 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:	<ul style="list-style-type: none"> • 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:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
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.	

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.

(Note to reviewer: If container size is 50 pounds or greater, use the following Environmental Hazards statement:)

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.

(Note to reviewer: If container size is less than 50 pounds, use the following Environmental Hazards statement:)

ENVIRONMENTAL HAZARDS: This pesticide product is toxic to fish and aquatic organisms

READ THE ENTIRE LABEL BEFORE USING

DIRECTIONS FOR USE

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

[PROFESSIONAL [SPA] [AND] [OR] [HOT TUB] TREATMENT

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

Use SPA CHLOR to [superchlorinate][shock treat] your [spa] [or] [hot tub] once a week during periods of normal or moderate usage.

Use SPA CHLOR to [superchlorinate][shock treat] 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] with SPA-CHLOR until the [free available chlorine][FAC] 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.] [ounce] package for every 450 [US] gallons [gal] 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] [FAC] 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 [AND] [OR] [HOT TUB] TREATMENT

[SPA CHLOR is a combination disinfectant and algacide 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] your [spa] [or] [hot tub] once a week during periods of normal or moderate usage.

Use SPA CHLOR to [superchlorinate][shock treat] 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] with SPA-CHLOR until the [free available chlorine] [FAC] 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 [spa] [or] [hot tub] and add 1 [oz.] [ounce] per 250 [US] [gallons] [gal] 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] [FAC] 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] [AND] [OR] [HOT TUB] 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 [US] [gallons] [gal] of water. Using an appropriate test kit, test and adjust the water to the following values:

pH:	7.2 - 7.8
Total Alkalinity:	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 recommendations] [your Beachcomber professional] 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] your [spa] [or] [hot tub] once a week during periods of normal or moderate usage. [Superchlorinate][shock treat] 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] [FAC] 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] [hot 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 [US] [gallons] [gal] of water. Check the [free available chlorine] [FAC] 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 2½ teaspoons of the product per 500 [US] [gallons] [gal] over the surface of the water. Always use a clean dry spoon. Test the [free available chlorine] [FAC] levels. Maintain a 1 - 3 ppm [free available chlorine] [FAC] level while the [spa] [or] [hot tub] is in use and a 4 - 5 ppm [free available chlorine] [FAC] 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] with 10 teaspoons of SPA CHLOR per 500 [US] [gallons] [gal] of 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 7½ [ounces] [oz.] of SPA CHLOR per 500 [US] [gallons] [gal] 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:>

[PROFESSIONAL POOL TREATMENT]

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

IMPORTANT NOTE: Pool should not be entered until the [free available chlorine] [FAC] level reaches 1 - 3 ppm, as determined by an appropriate test kit. Maintain a 1 - 3 ppm [free available chlorine] [FAC] 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 ENHANCER] or [pH REDUCER] according to the directions on the product labels.

[2.] To establish an initial 1 – 3 ppm [free available chlorine] [FAC] level add 11 – 22 [ounces] [oz.] of SPA CHLOR per 10,000 [US] [gallons] [gal] of pool water. Broadcast SPA CHLOR evenly over the pool surface for maximum effectiveness.

REGULAR POOL CARE:

Maintain proper [free available chlorine] [FAC] levels, as determined by an appropriate testing kit. A 1 – 3 ppm [free available chlorine] [FAC] level should be maintained while the pool is in use. A 3 - 5 ppm [free available chlorine] [FAC] 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 ENHANCER¹ or pH REDUCER² 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 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 [US] [gallons] [gal] 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] [FAC] 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]:

As a preventative treatment, [shock treat] [superchlorinate] pool water once per week. [Shock treatment] [superchlorination] 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 ENHANCER¹ or pH REDUCER² according to the directions on the product labels.

[2.] Broadcast 11 – 22 [oz] [ounces] of SPA CHLOR per 10,000 [US] [gallons] [gal] 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] of pool is recommended. A calcium hypochlorite product such as [TRU SHOCK] [BLAST-OUT] [and] [or] [ULTRASHOCK] should be used according to the directions on the product label for daily [superchlorination][shock treatment] of your pool during such conditions.]

1. pH Enhancer was formerly called "pH Plus," which appeared on the most recent EPA stamped label dated May 3, 2000

2. pH Reducer was formerly called "pH Reducer," which appeared on the most recent EPA stamped label dated May 3, 2000

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. Nonrefillable container. Do not reuse or refill this container. Rinse empty container thoroughly with water to dissolve all material before discarding. Offer for recycling if available or 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.]

[For proper care and maintenance of your [spa][hot tub] ask for Beachcomber's Guide to Clean and Simple [Spa][Hot Tub] Water]

[For more detailed instructions, ask for Beachcomber's Guide to Pool Water Care]

[beachcomberhottubs.com][puritypoolproducts.com]

[recycling logo][returnable container]

[Made In Canada]

[A signature line of products]

[Judy Scott, founder]

[Distributed by:] [Sold by:] [Manufactured by:]
BEACHCOMBER HOT TUBS PLUS INC.
 13245 Comber Way
 SURREY, BC
 CANADA V3W 5V8

EPA Reg. No. 54614-7
 EPA Est. No. *(insert EPA Est. No. here)*