

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



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.
Lithchlor
EPA Reg. No. 54614-8
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 comments/conditions 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

1. Revise the Ingredient Statement as follows:

Active Ingredient:	
Lithium Hypochlorite	29.0%
Other Ingredients:	<u>71.0%</u>
Total:	100.0%

2. The proposed label identifies 2 separate companies "Beachcomber Hot Tubs and Purity Pool Products." If these use sites are handled by two separate companies, then they should be assigned different company numbers. All references to Purity Pool Products have been removed from the label until such time as clarification is submitted and accepted by the Agency.

General Comments

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

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

LITHCHLOR

ACCEPTED COMMENTS
EPA Letter Dated:

MAY 29 2008

[Beachcomber Hot Tubs Logo]
[Treatment]
[Chlorinating Granules]
[beachcomberhottubs.com] [puritypoolproducts.com]
[A signature line of products]
[Judy Scott, founder]
[Pools][Spas][Hot Tubs]

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

54614-8

Active Ingredients:	
Lithium hypochlorite.....	29.0%
Inert Ingredients.....	71.0%
Total.....	100.0%

Contains 35% available chlorine

KEEP OUT OF REACH OF CHILDREN DANGER

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

FIRST AID:

IF SWALLOWED: 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 a poison control center or doctor. Do not give anything by mouth to an unconscious person.

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 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 INHALED: 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.

[See [Left] [Side] [Right] [Back] Panel for Additional Precautionary Statements] -or-

[See Precautionary Statements on [Left] [Side] [Right] [Back] Panel]

EPA Reg. No. 54614-8

EPA Est. No. (insert EPA Est. No. here)

Net Contents: (as indicated on container)

[Manufactured by:][Distributed by:][Sold by:]

Beachcomber Hot Tubs Plus Inc.

13245 Comber Way, Surrey, BC, CANADA V3W 5V8

Made in Canada

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS.

DANGER. Highly corrosive. May cause skin and eye damage. May be fatal if swallowed. Do not get in eyes, on skin or on clothing. Wear goggles or face shield and rubber gloves when handling. Irritating to nose and throat. Avoid breathing dust. Remove and wash contaminated clothing before reuse.

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

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, ponds, streams, 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 the EPA.

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

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish.

PHYSICAL AND CHEMICAL HAZARDS: Strong oxidizing agent. Mix only with water. Use clean, dry utensils. Do not add this product to any dispensing device containing remnants of any other product. 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 container in open air or well-ventilated area. Flood with large volumes of water, if necessary.

DIRECTIONS FOR USE

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

[POOL WATER CARE]

[HOW TO USE LITHCHLOR:

To start your pool: 1. Backwash filter. 2. Utilizing your pool test kit adjust pH of pool water to 7.2-7.6. Add soda ash or sodium bicarbonate to correct an acid condition (less than 7.2). Add sodium bisulfate if the pH is greater than 7.6. Maintain pH range of 7.2-7.6 for a minimum of six hours before the addition of Lithchlor and during the entire season. 3. Use two cups of Lithchlor per 5,000 [US] [gallons] [gal] of water.

After the [proper] pH range (7.2-7.6) and chlorine residuals (1.0-1.5) have been established, it is beneficial to add a chlorine stabilizer (cyanuric acid) to the pool to prevent extreme fluctuations in the chlorine level. Cyanuric acid is available at most pool dealers and should be added in accordance to the instructions on the package for maximum stabilization of the pool water.

HOW TO MAINTAIN THE PROPER CHLORINE RESIDUAL:

The chlorine residual should be maintained between 1.0 and 1.5 ppm available chlorine as determined by the chlorine test kit. Under normal conditions, this residual can be maintained by the daily addition of about 1/3 cup (2.7 ounces) of Lithchlor for each 5,000 [US] [gallons] [gal] of pool water-if the pool water is properly stabilized with 3.0-5.0 ppm of cyanuric acid pool stabilizer. Severe conditions, such as high temperature or continued use by many people, will require higher daily dosage, whereas smaller doses may suffice in spring and fall or when the pool is not being subjected to normal bathing loads

The pool water should be super-chlorinated about once each week. Five times the normal daily addition, or a minimum of one cup [8 ounces] per 5,000 [US] [gallons] [gal] of pool water should be added in the evening when the pool will not be used for a minimum of 12 hours. Test the chlorine residual and if above 2.0 ppm do not allow swimming until residual has decreased.]

[[SPA] [AND/OR] [HOT TUB] WATER CARE]

[Effective use of all [spa] [and] [or] [hot tub] sanitizers depends on maintaining proper water balance. The following ranges are highly recommended:

pH: 7.4-7.8

Total Alkalinity: 125-150 ppm

Calcium Hardness: 200-300 ppm

Residual Available Chlorine: 2.0-3.0 ppm

Cyanuric Acid (Indoors): 0 ppm; (Outdoors) 30 ppm

DIRECTIONS: Use one-quarter ounce of Lithchlor per 250 [US] [gallons] [gal] of water as an initial treatment. Repeat the procedure until a residual of 2.0 to 3.0 ppm is established. Frequent testing to determine additional doses needed to maintain the proper residual is highly recommended. Use a reliable test kit with fresh sensors for pH and chlorine testing.

If a need for superchlorination arises; use one-half ounce of Lithchlor per 250 [US] [gallons] [gal] of water. Bathers should not enter the [spa] [hot tub] until the available chlorine residual falls to 3.0 ppm.

Before using the [spa] [and] [or] [hot tub], shower in order to avoid adding soap, lotions, or oils from the body into the water. Do not add food or beverages to the water. Avoid overloading the [spa][hot tub].

If the [spa] [hot tub] is used daily, it should be drained completely and fresh filled about once a month.]

(Residential/Small Container Label:)

STORAGE AND DISPOSAL:

STORAGE: Store in a cool dry place. Do not transfer into unlabeled containers. Close container tightly after each use. Protect from moisture and heat. **DISPOSAL:** Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available or securely wrap original container in several layers of newspaper and discard in trash.

(Bulk/Non-Residential Label:)

STORAGE AND DISPOSAL:

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool dry place. Do not transfer into unlabeled containers. Close container tightly after each use. Protect from moisture and heat. **PESTICIDE DISPOSAL:** Wastes resulting from this product may be disposed of on site or at an approved waste disposal facility. **CONTAINER DISPOSAL:** Nonrefillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Offer for recycling if available or dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities. If drum is not to be reused or is contaminated and cannot be reused, dispose of in the same manner.

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

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

[Made in Canada]

*Bracketed text denotes alternate marketing language and use directions.

383