

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



United States
Environmental Protection
Agency

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.
Mini Pucks
EPA Reg. No. 54614-9
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:

Trichloro-s-Triazinetrione	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.

3. The Alternate Brand names "Pucks and Super Pucks" which cannot appear on an EPA stamped label have been removed.

4. This registration consists of one product. Therefore, it is unclear what is meant by the phrase "A signature line of products." Please provide clarification.

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

MINI PUCKS (Basic Product Name)

[Beachcomber Hot Tubs Logo]
[[for] [Spas] [Pools] [Hot Tubs]]
[Treatment]
[Recommended for Daily Use in [Pools] [Spas] [Hot Tubs]]
[Dissolves Slowly and Completely]
[Contains No Scale Forming Minerals]
[[1/4] [1.5] [6.5] [Ounce] [oz.] Tablet]
[[15] [50] [200] [Gram] [gm] Tablet]
[Treatment]
[A signature line of products]
[Judy Scott, Founder]

Active Ingredient:
Trichloro-s-Triazinetrione..... 99.0%
Inert Ingredients..... 1.0%
Total..... 100.0%
Contains 90.0% Available Chlorine

KEEP OUT OF REACH OF CHILDREN
DANGER

[See [left] [side] [right] [back] panel for [Additional Precautionary Statements][First Aid and Precautions]]

EPA Reg. No. 54614-9
EPA Est. No. (insert EPA Est. No. here)
Net [Contents][Wt.]: (as indicated on container)

[Manufactured by: ASCO (P) LTD.] [Sold by:]
Beachcomber Hot Tubs Plus Inc.
13245 Comber Way, Surrey, BC, CANADA V3W 5V8
EPA Letter Dated:

MAY 29 2008

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 54614-9

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. Do not breathe dust, vapor or spray mist. Wear
goggles, face shield or safety glasses. Wash thoroughly with soap and
water after handling. Remove contaminated clothing and wash before
reuse.

(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 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 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 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.

(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 and aquatic organisms. 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.

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(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

CHEMICAL HAZARDS: DANGER: Strong oxidizing agent. Use only clean, dry utensils. Mix only into water. Contamination with moisture, dirt, organic matter or other chemicals (including other pool chemicals) or any other foreign matter may start a chemical reaction with generation of heat, liberation of hazardous gases, and possible generation of fire and explosion. Avoid any contact with flaming or burning material such as lighted cigarette. Do not use this product in any chlorinating device which has been used with any inorganic or unstabilized chlorinating compounds (e.g., calcium hypochlorite). Such use may cause fire or explosion.

DIRECTIONS FOR USE

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

This product is designed to dissolve slowly, providing a steady source of available chlorine in [swimming pools] [spas] [and] [or] [hot tubs] to control the growth of algae, kill bacteria and destroy organic contaminants. READ THE PRECAUTIONARY STATEMENTS BEFORE USE.

[DIRECTIONS FOR POOL USE]

[METHOD OF APPLICATION:

Use in a floating dispenser, automatic chlorinator or feeder designed for this product or place in skimmer. Use in a new chlorinating device or any device which has previously contained only this product or whose active ingredient is trichloro-s-triazinetrione. If placed in the skimmer, run the pump a minimum of eight hours daily. DO NOT: REUSE floaters or feeders from other dry chlorinating products. DO NOT: Throw tablets directly into pool. DO NOT: Permit tablets to contact plastic pool linings or metal objects. DO NOT: Use with any other tablets or sticks in the same skimmer, floater, or feeder. DO NOT: Use in any chlorinating device which has been used with other chlorinating compounds.

WATER BALANCE:

Maintain recommended daily levels as determined by a testing kit:

pH:	7.2 to 7.8
Total Alkalinity:	90 to 125 parts per million (ppm)
Calcium Hardness:	above 200 ppm
Stabilizer:	25-60 ppm
Free Available Chlorine:	1.0-3.0 ppm

Test frequently using a reliable test kit that measures all these ranges. Make any necessary adjustments promptly with the appropriate [Beachcomber][Purity Pool] Water Treatment Products.

ROUTINE CHLORINATION:

1. Chlorinate by [adding][placing]
[four [tablets] [Mini Pucks] per 10,000 [US] [gallons] [gal] of pool water every other day]
[one [tablet] [Mini Pucks] per 2500 [US] [gallons] [gal] of pool water every other day]
[two [tablets] [Pucks] per 15,000 [US] [gallons] [gal] of pool water every other day]
[one [tablet] [Super Pucks] per 22,000 [US] [gallons] [gal] every three days]
[one [tablet] [Super Pucks] per 32,500 [US] [gallons] [gal] every other day)
or as often as needed to maintain a chlorine residual at 1.0 to 3.0 ppm. Follow "Method of Application." This dosage may vary depending upon bather load, water temperature and other conditions.
2. If using an automatic chlorinator, fill the chamber(s) with tablets and adjust flow rate, according to manufacturer's recommendations to maintain proper chlorine residual. Adding tablets to the pool's skimmer basket is an alternative chlorine feed method.
3. Pool should not be entered until the chlorine residual is 1.0 to 3.0 ppm as measured with a reliable test kit. Reentry into treated swimming pool is prohibited above levels of 3.0 ppm available chlorine.
4. As a preventative treatment, weekly [shock treatment] [superchlorination] of pool water is recommended. Follow label instructions of [True Shock] [Blast Out] [or] [Ultra Shock]. In addition to weekly [shock treatment] [superchlorination], you should [shock treat] [superchlorinate] to remedy problems which may occur when bathing loads are high, water appears hazy or dull, unpleasant odors or eye irritation occur, after heavy wind and rainstorms, or if algae does develop with resulting green color and slimy feeling.

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POOL START UP:

1. Add ELIMINATE for pools to eliminate problems caused by minerals and calcium.
2. Balance pool hardness and alkalinity with CH PLUS and TA PLUS.
3. Adjust pH with pH ENHANCER or pH REDUCER.
4. Shock treat pool water with [TRU SHOCK], [BLAST OUT], [or] [ULTRA SHOCK].
5. Stabilize pool water with SUNSCREEN.
6. Add PUREZYME.

REGULAR TREATMENT:

1. Test daily for pH and chlorine level.
2. Adjust pH with pH ENHANCER or pH REDUCER, raise chlorine level with [BLAST OUT] [TRU SHOCK] [or] [ULTRA SHOCK].
3. Maintain chlorine level daily with [MINI PUCKS], [PUCKS], [SUPER PUCKS], [STEDI-CHOR] [or] [PURESHOCK].
4. Shock treat every 7 days with ULTRA SHOCK or TRU SHOCK.
5. Add SUPER ALGYZINE 12 hours after ULTRA SHOCK or TRU SHOCK.
6. Add PUREZYME weekly.

To determine your pool capacity in U.S. gallons, use the appropriate formula below: (Use measurements in feet only).

Rectangular: Length X Width X Average Depth X 7.5 = Total Gallons

Round: Diameter X Diameter X Average Depth X 5.9 = Total Gallons

Oval: Maximum Length X Maximum Width X Average Depth X 5.9 = Total Gallons

Freeform: Surface Area (Sq. Feet) X Average Depth X 7.5 = Total Gallons

[DIRECTIONS FOR [SPA] [AND] [OR] [HOT TUB] USE]

[Each half ounce of this product will provide approximately 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 Alkalinity: 90-125 ppm
Calcium Hardness: 200 ppm minimum

Maintain these conditions for proper [spa] [and] [or] [hot tubs] operation by frequent testing with a test kit. Do not allow cyanuric acid level to exceed 150 ppm. It is recommended that [spa] [and] [or] [hot tubs] be drained every 30-90 days more often under heavy use. Consult [manufacturer's recommendations] [your [Beachcomber][Purity Pool Products] 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.

START UP - FRESHLY FILLED

Before use, read installation instructions and operating manual for the appropriate feeder or dissolving container. Turn on the circulation system and ensure that it is operating properly. Fill feeder or dissolving container with [product] [MINI PUCKS] [PUCKS] [SUPER PUCKS] and maintain 3 ppm [free available chlorine] [FAC]. [Spa] [and] [or] [hot tub] should not be entered until the [free available chlorine] [FAC] is 3 ppm or less.

REGULAR USE

Maintain 1-3 ppm [free available chlorine] [FAC] while the [spa] [or] [hot tub] is in use. After each use, shock treat to control odors and algae by dosing with a 10 ppm [free available chlorine] [FAC] residual. Repeat as needed. [Spa] [and] [or] [hot tub] should not be entered until [free available chlorine] [FAC] reaches 1-3 ppm.

EXTENDED NON-USE PERIOD

During extended periods when [spa] [or] [hot tub] is not being used, maintain 3-5 ppm [free available chlorine] [FAC].

STORAGE AND DISPOSAL:

Do not contaminate water, food, or feed by storage and disposal. STORAGE: Keep product dry in tightly closed container when not in use. Store in a cool dry well-ventilated area away from heat or open flame. Do not reuse container. DISPOSAL: 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.

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

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

[Made in Canada]

[beachcomberhottubsplus.com]

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