



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

DEC 19 2011

Mr. Zuhai Tompkins  
Technology Sciences Group, Inc.  
1150 18<sup>th</sup> Street, Suite 1000  
Washington, DC 20036

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Subject: ProTeam 3" High Tech Tablet  
EPA Registration No.: 57787-31  
Application Date: 09/21/2011  
Receipt Date: 09/21/2011

Dear Mr. Tompkins:

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable with conditions.

**Proposed Amendment**

- Response to Agency's letter dated Augusts 29, 2011

**Conditions**

Revise the label as follows:

1. Remove "EPA Registered" from the phrase "[Step 3 – Add EPA Registered ALGAECIDE to prevent algae before it starts." EPA cannot enforce this.

**General Comments**

A stamped label with conditions is enclosed for your records. Submit three (3) copies of your final printed label before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-0410 or by e-mail at [harris.monisha@epa.gov](mailto:harris.monisha@epa.gov) or Jaclyn Carl at 571-384-5684 or by email at [carl.jaclyn@epa.gov](mailto:carl.jaclyn@epa.gov). When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

A handwritten signature in black ink, appearing to read "Monisha Harris".

Monisha Harris  
Product Manager (32)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

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# ProTeam® 3" HIGH TECH TABS

[Sanitizer]

[Patented\* Technology Exclusively Designed For Use With The ProTeam® System In Automatic Chlorinator or Floating Feeders]

KEEP OUT OF REACH OF CHILDREN

## DANGER

### FIRST AID

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Chemtrec 1-800-424-9300. 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. Chemtrec 1-800-424-9300.

**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 poison control center or doctor for further treatment advice. Chemtrec 1-800-424-9300.

**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. Chemtrec 1-800-424-9300.

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.

See [back] [side] panel for additional precautionary statements.

### ACTIVE INGREDIENTS:

Trichloro-s-triazinetrione.....	91.5%
Disodium Biborate Pentahydrate.....	5.0%
OTHER INGREDIENTS.....	3.5%
TOTAL.....	100.0%

Manufactured for:  
Haviland Consumer Products, Inc  
412 Ann St. NW  
Grand Rapids, MI 49504

EPA Reg. No. 57787-31  
EPA Est. No. 82835-MI-1

Net Contents: (see container label)  
Batch Code # / Lot #: (see container label)

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

DEC 19 2011

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 57787-31

**PRECAUTIONARY STATEMENTS****HAZARD TO HUMANS AND DOMESTIC ANIMALS**

**DANGER:** Fatal if inhaled. Corrosive. Causes skin burns and irreversible eye damage. Harmful if swallowed or absorbed through skin. Do not breathe dust. Do not get in eyes, on skin or on clothing. Wear protective eyewear (safety glasses) and rubber gloves when handling this product. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse. Wash hands before eating, drinking, chewing tobacco, or using the toilet.

**ENVIRONMENTAL HAZARDS**

This pesticide 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 into sewer system without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or the regional office of the EPA.

**PHYSICAL OR CHEMICAL HAZARDS**

**STRONG OXIDIZING AGENT.** Do not mix with other chemicals. Mix only with water. Never add water to product. Always add product to large quantities of 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 and explosion. Contamination with moisture, organic matter or other chemicals will start a chemical reaction and generate heat, hazardous gas, possible 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 area with large volumes of water.

**DIRECTIONS FOR USE:** It is a violation of federal law to use this product in a manner inconsistent with its labeling. Read entire container and use strictly in accordance with precautionary statements and directions. Prior to using this product, the filter system should be properly cleaned and backwashed and the pool water pH adjusted to 7.2-7.6. It is recommended that the pool be superchlorinated to establish a chlorine residual of 2 ppm of free chlorine.

This product is specially formulated for use in automatic type feeders. It provides highly effective pool water sanitization and algae control when used in this manner. This combination of ingredients enhances the water quality to reduce potential eye and skin irritation. This product is formulated to dissolve more cleanly and uniformly in automatic feeders thereby reducing plugging, fouling, maintenance requirements and adjustments.

*{Optional Marketing Statement, shown in [ ]}*

[There are three important steps to follow to maintain sparkling clear water in your pool:]

[Step 1 – Add Proteam 3” High Tech Tabs to control bacteria.]

[Step 2 – Add SHOCK to destroy contaminants.]

[Step 3 – Add EPA Registered ALGAECIDE to prevent algae before it starts.]

[All three steps are vital to achieve sparkling clear water.]

Proteam 3” High Tech Tabs (EPA Reg. No: 57787-31)

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**INITIAL APPLICATION:** This product is specially designed for use in floaters and automatic type feeders **except for bromine only type feeders (See Notice below)**. Prior to adding this product to the feeder, refer to the operating instructions provided by the manufacturer of the unit. Add to the feeder an initial supply of tablets. Close the feeder, making sure the lid is securely tightened. Adjust the feeder to the lowest setting according to the manufacturer's instructions. Approximately 3 to 4 days after adding the initial supply of tablets into the feeder, turn off the pump, open the feeder and observe the quantity of tablets remaining. If more than ½ of the tablets are gone contact your ProTeam® dealer for recommendations on how to reduce your feed rate. If at least ½ of the tablets remain in the feeder, turn pump back on and check the residual of sanitizer in the pool water using a ProTeam® test kit. Adjust the feeder to provide a sanitizer level within the ideal range of 1.0-1.5 ppm in the pool water.

**ROUTINE MAINTNENCE:** Test pool water regularly (at least weekly) and check feeder weekly, refilling as needed. Add initial product and adjust the feeder as needed to maintain an ideal sanitizer level of 1.0-1.5 ppm in the pool water. Regular use of a ProTeam® test kit is recommended to make certain adequate levels of sanitizer and proper pH are being maintained in the pool water.

**NOTICE:** Do not use this product in automatic brominators. Use of this product through a bromine type feeder could cause an adverse chemical reaction or explosion resulting in serious bodily injury, death, or property damage.

**Reentry into treated swimming pools is prohibited above levels of 3 ppm chlorine.**

#### STORAGE AND DISPOSAL

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

**Pesticide Storage:** Keep this product dry in a tightly sealed container when not in use. Store in a cool, dry, well-ventilated area away from heat or open flame. In case of decomposition, isolate container (if possible) and flood area with large amounts of water to dissolve all material before discarding the container.

**Pesticide Disposal:** Pesticide wastes may be 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:** Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Triple rinse (or equivalent) promptly after emptying.

**Emergency Phone: CHEMTREC 1-800-424-9300**

**NOTE:** Buyer assumes all responsibility for safety and use not in accordance with directions.

\*The ProTeam® SYSTEM is a patented method for treatment of swimming pools. Additional patents pending.

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{Optional Marketing Statements, shown in [ ]}

[A Concentrated Formula for Continuous Chlorination to Control Bacteria and Algae in Swimming Pools]

[For Use in Automatic Chlorinator or Floating Feeders]

[For Use with Automatic Chlorinator or Floating Feeders]

[For Use with the [ProTeam] System in Automatic Chlorinator or Floating Feeders]

[Patented Technology]

[Step 1] {Sanitizer is marketed as Step 1 of a three step program to treat swimming pool water to allow easy product identification by consumers. This marketing statement is closely associated with the {Optional Marketing Statement} under the "Directions for Use" section.}

