UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SEP 3 0 1998

Mr. Mark Jernigan Federal Registration Manager Recreational Water Products, Inc. P. O. Box 887 Scottdale, GA 30079

Dear Mr. Jernigan:

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Subject: Your Response to letters dated July 17, 1998 and August 13, 1998
Revised Amended Labeling Aqua Chem Balanced for Clean
Spas Algicide
EPA Registration Number 67262-8
Your Amended Application Dated August 21, 1998

The amendment referred to above, submitted in connection with registration unde the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

- 1. Based on your comments #2 and EPA's letter dated July 17, 1998, under the heading, "NOW USE THIS PRODUCT", change the word "Sanitizer" to "chlorine", we have reconsider your request and we will allowed the word "Sanitizer" to remain on your proposed labeling August 21, 1998.
- 2. Please note that under the important notes heading, the word ("Shock") must be replaced back in the instructions of the proposed labeling dated August 21, 1998. For further information, please refer to the "Guidance Document for the Reregistration of Pesticide Products containing the Active Ingredient "Sodium and Calium Hydrochlorite Salts (Case Number #0029).

STREAM SUPPLIES

- 3. Per our letter dated July 17, 1998, #5, under the heading "Physical and Chemical Hazards", statements, we will allowed the phrase "Do not mix with other chemicals" to remain on your proposed labeling dated August 21, 1998.
- 4. The basic Confidential Statement of Formula (CSF) dated October 21, 1994, is in compliance with PR Notice 91-2 and it agrees with the revised updated label ingredient statement dated August 21, 1998 and it is acceptable.

Submit three (3) copies of your final printed labeling before you release thhe product for shipment. A stamped copy of the labeling is enclosed for your records.

If you have any questions concerning this letter, please contact LaVerne Dobbins at 9703) 308-6378.

Sincerely,

Adam Heyward

Product Manager (34)

Regulatory Management Branch II
Antimicrobials Division (7510W)

Enclosure:

Proposed label with changes marked, 3 9 5

text in brackets $[x\infty]$ is optional and may or may not be included on a final label. Il text in braces {xxx} is admiristrative and will not appear on a final label.}

AQUA CHEM BALANCED FOR CLEAN SPAS ALGICIDE

{Optional marketing statements that may be used with spa algaecide.}

[Prevents Algae Growth]

[Algaecide]

[For Fast Algae Control]

Non-Foaming

[Algaecide for Spas]

ACCEPTED with COMMENTS in EPA Letter Dated:

SEP 3 0 1998

thudes the Pederal Insecticide. Fungicide, and Redenticide Act 36 amended, for the pesticide, registered under EPAReg. No. 67262-8

ACTIVE INGREDIENT:

Poly (oxyethylene (dimethylimizio) ethylene-

(dimethyliminio) ethylene dichleride)

OTHER INGREDIENTS:

TOTAL INGREDIENTS:

6.0%

94.0%

100.0%

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID IF CONTACT WITH EYES OCCURS: Immediately flush with cold water for at least 15 minutes. Then get immediate medical attention. IF CONTACT WITH SKIN: Wash off excess chemical with soap and water and flush skin with cold water for at least 15 minutes. If irritation persists, get medical azention. IF INHALED: Remove to fresh air. If breathing is difficult, have trained person administer exygen. If not breathing, give artificial respiration. Call a physician immediately. IF SWALLOWED: Drink large amounts of water. Do not induce vomiting. Avoid alcohol. Never give anything by mouth to an unconscious person. Call a physician or poison control center immediately. IN CASE OF MEDICAL EMERGENCY, CALL 1-303-623-5716.

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

chg. MANUFACTURED FOR:

RECREATIONAL WATER PRODUCTS

SCOTTDALE, GEORGIA

EPA REG. #67262-8

EPA EST. # 5185-GA-1

NET CONTENTS:

WHY TO USE THIS PRODUCT: This product efficiently and economically reduces the growth of algae in spas and hot tubs. It is designed for use as part of your routine maintenance program, not for removal of heavy algae growths.

IMPORTANT NOTES

1. When using other products, as outlined in directions for this product, always follow label directions for those products.

2. Sunlight, rainfall, temperature, number of bathers and frequency of spa use affect the rate of sanitizer loss. Adjust cleaning and chemical maintenance accordingly. To prevent the establishment of harmful algae, superchlorinate spa weekly.

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DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in any manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

BEFORE YOU BEGIN

- 1. Ensure all spa equipment is working properly. Clean filter following manufacturer's directions.
- 2. Check water alkalinity, pH and calcium hardness with a test kit. Adjust alkalinity to 80-125 ppm for plaster spas, 125-150 for other types of spas by adding an alkalinity increaser. Adjust pH to 7.2-7.6 by adding a pH decreaser to lower pH, or by adding a pH increaser to raise pH. Adjust calcium hardness to 200-275 ppm for plaster spas, 175-225 for other types of spas by adding a calcium hardness increaser.

NOW USE THIS PRODUCT

- 1. To remove existing algae where growth has become visible, pour product directly into spa at a rate of 10-15 fl. oz. per 1,000 gallons of water.
- 2. Operate recirculating pump while adding product and for 1 hour afterward to ensure even distribution and maximum effect.
- 3. For newly cleaned and filled spas or hot tubs, pour product directly into spa at a rate of 7-10 fl. oz. per 1,000 gallons of water. Operate recirculating pump while adding product and for one hour afterward.
- 4. To reduce future growth of algae, a regular maintenance application of this algicide is recommended. Add product weekly at a rate of 2-5 fl. oz. per 1,000 gallons or more frequently depending on usage conditions, following directions above.

5. Recheck pH, total alkalinity, residual sanitizer levels following treatment and adjust as necessary.

ACCEPTED with COMMENTS in EPA Letter Dated:
SEP 3 0 1998

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
regended, for the pesticide,
reced under EPA Reg. No. 67262-8

AND DISPOSAL Keep this product dry in original tightly closed container when not in use. Store in ry, well ventilated area away from heat or open flame. Do not comminate food or feed by storage or LACONTAINER DISPOSAL: Do not reuse container, but place in trash collection. Rinse thoroughly discarding in trash. Leleted text

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION Avoid contact with eyes, skin, and clothing. Harmful if swallowed. Wear goggles or safety glasses and rubber gloves when handling this product, rritaring to nose and throat. Avoid breathing vapors. Remove and wesh contaminated clothing before reuse. For skin er eye contact, or if vapors are inhaled, immediately follow first aid instructions on front label panel.

PHYSICAL OR CHEMICAL HAZARDS Do not mix with other chemicals. < deleted text

Primental hazards statement for end-use products in containers of less tran 5 gallons (liquid) or less tran 5 pounds (solid, dry weight).}

ENVIRONMENTAL HAZARDS This pesticide is toxic to fish and aquatic organisms.]

!Environmental hazards statement for end-use products in containers of equal to or greater than 5 gallons (liquid) or equal to or greater than 50 pounds (solid, dry weight).

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 to sewer systems without previously notifying the liteal sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

The following is optional text to be used at Recreational Water Products' discretion. This information is non-essential and will be provided only as a courtesy. Will not appear on all libels.

POSE: Any questions or comments about Aqua Chem Products? In the commental U.S. call 1-800-252-POSE (7665). Ask for your free pool care booklet.]

[Questions or comments, Call 1-800-252-POOL (7665).]

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

with COMMENTS
in EPA Letter Dated:
SEP 30 APP

Under the Federal Inscrinde.
Fungicide, and Redescribe Art as amended, for the restricte.
registered under EPA long. No. 167262-8