

67262-27

4/2/2012

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

April 2, 2012

Mark Jernigan
Regulatory Affairs Manager
Recreation Water Products, Inc
P O Box 1449, Buford, GA 30515-1449

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Subject RWP Shock Plus
EPA Reg # 67262-27
Notification Date March 9, 2012
Receipt Date March 13, 2012

Dear Mr Jernigan

This acknowledges the receipt of your notification, submitted under the provision of PR Notice 98-10 and FIFRA section 3(c)9

Proposed Notification

Addition of a marketing claims, "Reduces eye irritation", "Helps reduce eye irritation", "Destroys eye irritating compounds in swimming pool water" and "Helps makes swimming pool water less irritating to eyes" for "RWP Shock Plus" (EPA Reg# 67262-27) Cited reference was Geo Clifford White, 1972, Handbook of Chlorination

General Comment

Based on the review of the material submitted, the additional above noted labeling claims is acceptable

This notification will be acceptable when the revised label with conditions set forth in this letter has been resubmitted to the Agency for review and approval

If you have further question on this letter, please contact David Liem by email at liem.david@epa.gov or call at 703-305-1284

Sincerely

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

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

2014



United States
Environmental Protection Agency
Washington DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1 Company/Product Number 67262-27	2 EPA Product Manager Monisha Harris	3 Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4 Company/Product (Name) RWP Shock Plus	PM# 32	
5 Name and Address of Applicant (Include ZIP Code) Recreational Water Products Inc PO Box 1449 Buford, GA 30515 <input type="checkbox"/> Check if this is a new address	6 Expedited Review In accordance with FIFRA Section 3(c)(3) (b)(i) my product is similar or identical in composition and labeling to EPA Reg No _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment Explain below	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification Explain below	<input type="checkbox"/> Other Explain below

Explanation Use additional page(s) if necessary (For section I and Section II)
Fee Determination Fee Category Not Applicable (Notification) mark.jernigan@chemtura.com
Notification to add additional marketing statements Additions are marked on pages 2 and 3 of enclosed label Justification for permitting the addition of these claims regarding use of the product to reduce eye irritation are provided in the cover letter Per PR Notice 98-10 Section II (Labeling Notifications) Part N (Other Revisions) Please see attached page for certification

Section - III

1 Material This Product Will Be Packaged In				2 Type of Container	
Child Resistant Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If Yes Unit Packaging wgt	No per container	If Yes Package wgt	No per container
3 Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4 Size(s) Retail Container 14 ounces to 20 lbs		5 Location of Label Directions <input checked="" type="checkbox"/> On label	
6 Manner in Which Label is Affixed to Product		<input checked="" type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1 Contact Point (Complete items directly below for identification of individual to be contacted if necessary to process this application)		
Name Mark Jernigan	Title Regulatory Affairs Manager	Telephone No (Include Area Code) 678 502 4149
Certification I certify that the statements I have made on this form and all attachments thereto are true accurate and complete I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law		6 Date Application Received (Stamped)
2 Signature 	3 Title Regulatory Affairs Manager	
4 Typed Name Mark Jernigan	5 Date 3/9/2012	

EPA Registration Number 67262-27

Product RWP Shock Plus

Application for Pesticide dated March 9, 2012

Section - II

Explanation (Continued)

Notification to add additional marketing claims Per PR Notice 98-10, Section II, (Labeling Notifications), Part N (Other Revisions)

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Mark Jernigan
3/9/2012



March 9, 2012

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U S Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Re RWP Shock Plus
EPA Registration No 67262-27

Dear Ms Harris

Please process the enclosed notification for the above referenced product

The purpose of this notification is to add optional marketing claims relating to the reduction of eye irritation to the front panel. This claim had previously been permitted on the label. However, when this label was amended on August 8, 2011, we were instructed to remove the "Reduces eye irritation" claim. We believe this is a valid claim based on the justification provided below. The claims requested to be added are located on pages 2 & 3 of the enclosed master label.

RWP acknowledges that the product itself is an eye irritant and may cause eye damage if not removed from the eye promptly. However, the claim "Reduces eye irritation" is based on the product's attribute of supplying a rapid dose of free available chlorine to swimming pool water when it is applied as a shock product per label directions.

Swimming pool water contains ammonia and organic nitrogen compounds (sources include sweat and urine). These nitrogenous compounds can combine with the free available chlorine in the swimming pool water to form chloramines. Chloramine is a lacrimator, that in swimming pool water produces eye irritation (red eye) and irritating chlorine odors. In fact, a well operated swimming pool should not have a chlorine odor. Poorly operated swimming pools allow chloramines to build up resulting in the "chlorine odor" associated with swimming pools.

Shock treatment of swimming pool water provides a rapid increase in free available chlorine which breaks the chlorine – nitrogen bond in chloramines, destroying the chloramines, and reducing ammonia in the water to nitrogen gas and hydrochloric acid, to prevent future formation of chloramines.

Ms Monisha Harris
 March 9, 2012
 Page 2

RWP requests that based on the above information and clarification that EPA reconsider its decision and allow the use of "Reduces eye irritation" as it is a legitimate claim and useful information for the consumer to understand that this product provides a possible remedy if they have swimmers that complain of eye irritation

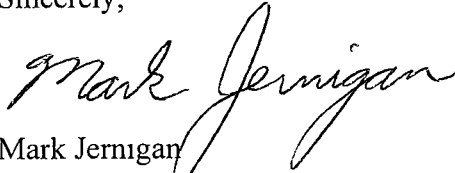
Enclosed are

- 1 Application for Pesticide (EPA Form 8570-1),
- 2 Notification Certification Statement, and
- 3 Proposed label with changes marked

If you have any questions, please call me at 678-502-4149 or mark.jernigan@chemtura.com

Thank you for your attention to this matter

Sincerely,



Mark Jernigan
 Regulatory Affairs Manager
 Enclosures

{All text in brackets [xxx] is optional and may or may not be included on a final label }
{All text in braces {xxx} is administrative and will not appear on a final label }

RWP SHOCK PLUS®

ACTIVE INGREDIENT

Sodium dichloro-s-triazinetriene 58.2%

OTHER INGREDIENTS 41.8%

TOTAL INGREDIENTS 100.0%

NOTIFICATION
Date Reviewed 7/24/12
Reviewed By [Signature]

KEEP OUT OF REACH OF CHILDREN

DANGER

See [back] [side] panel for First Aid and additional precautionary statements

MANUFACTURED FOR
RECREATIONAL WATER PRODUCTS
P O BOX 1449
BUFORD, GEORGIA 30515

EPA REG NO 67262-27
EPA EST NO 5185-GA-1

NET CONTENT {as indicated on container}

[TO OPEN CUT ALONG DOTTED LINE WITH SCISSORS] *{Statement to appear in upper corner of child resistant bag when product is sold in a bag }*

[What?] *{For use on front panel of label as a header above/beside product name }*

[Why?] *{For use on front panel of label as a header above/beside use claims chosen from accepted label text that relates to the consumer features and benefits of product }*

[4-IN-1 POOL SHOCK]

[Oxidizer, Buffer, Clarifier and Flocculant]

[No pre-dissolving]

[Produces super clear water]

[Treat and Swim in as soon as 15 minutes*]

[Swim in as soon as 15 minutes after use*]

[*Refer to the Re-entry statement on the back panel for further guidance] *{This statement will appear on the front panel of label when one of the asterisked statements is used concerning swim in 15 minutes }*

[Reduces the need for other maintenance products]

[Fast dissolving shock treatment]

[Do not mix with other products]

[Treats 12,000 gallons] *{Only to be used when sold in one pound units }*

[One pound treats 12,000 gallons]

[For use with small pools]

[For small pools]

[For small vinyl pools]

[Treats pools up to 10,000 gallons]

[U S Patent # 5,670,059]

[For use with all pool surfaces]

[For all pool surfaces]

[For all pool surfaces] [including vinyl, plaster and fiberglass]

[For all pools, including vinyl, plaster and fiberglass]

[Reduces organic contaminants]

[Clarifies water]

[Clears cloudy water]

[Creates sparkling water]

[Enhances filtration]

[Improves filter performance]

[Gathers debris for easy removal]

[Gathers debris for easy filtration]

[Does not increase pH]

[pH balanced]

[Reduces chlorine odor and eye irritation]

[Suitable for opening pools]

[Suitable for pool opening and winterization]

[Suitable for pool opening and closing]

[Suitable for winterizing pools]

[Can be used in salt pools]

[Compatible with salt pools]

[Suitable for closing pools]

[Reduces chlorine odor]

[Reduces eye irritation]

[Helps reduce eye irritation]

[Destroys eye irritating compounds in swimming pool water]

← new text

[Helps make swimming pool water less irritating to eyes]

← new text

[PATENTED TECHNOLOGY]

[Made in USA]

[When?] {For use on front panel of label as a header above/beside text chosen from accepted label text that relates to the consumer anticipated frequency of product use }

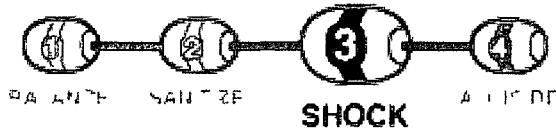
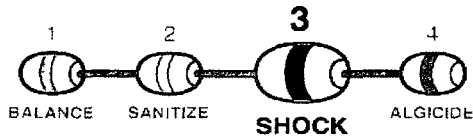
[1 X a week]

{The ' Pool Essentials System' box below may be placed on the label to allow easy product category identification by consumers }

Pool Essentials System	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
	balance	chlorinate	shock	algaeicide

{The 4-step System box below may be placed on the label to allow easy product category identification by consumers }

4 step System	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
	1	2	3	4
	balance	chlorinate	shock	algaeicide



4-Step System **1** **2** **3** **4**

Step **3**

{Directions to be used for shock application, Option A}

[WHY TO USE THIS PRODUCT] This premium shock product is easy to use and performs multiple, important maintenance functions. Shock Plus® effectively oxidizes during shock treatment organic contaminants that cause cloudy water, musty odors and eye irritation by utilizing advanced patented technology. This technology combines oxidizers, water clarifiers, flocculants and buffers to provide crystal clear water with no cloudy residue and without increasing pH like ordinary shock products.

Shock Plus is designed for use in all pool types by adding the product directly to the pool without pre-dissolving. Because it dissolves rapidly and performs multiple maintenance functions, this product works fast and effectively, allowing swimming to resume in as little as 15 minutes *. Shock Plus is ideal for both last minute and routine maintenance applications.]

{or}

[WHY TO USE THIS PRODUCT] Swimming pool shock treatment.]

⚠ DO NOT mix Shock Plus directly with any other shock products or pool chemicals, as violent reactions could occur. Shock Plus must be applied directly into the pool water. DO NOT pre-dissolve Shock Plus.

IMPORTANT NOTES

- 1 When using other products, always follow label directions for those products.
- 2 As with other products, this product may promote metal stains on pool surfaces. Always check water for metal content and if present, remove metals with a stain and scale inhibitor prior to the addition of this product.
- 3 This product is not a sanitizer or algicide. To sanitize your pool or for removal of algae, use the appropriate [Pool Time] [Aqua Chem] product specifically formulated for those purposes.

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 Make sure all pool equipment is working properly.
- 2 Backwash filter following manufacturer's directions.
- 3 Check alkalinity, pH and calcium hardness with a test kit. Adjust alkalinity to 80 - 125 for plaster pools and 125 - 150 for vinyl and fiberglass pools. Adjust pH to 7.2 - 7.6. Adjust calcium hardness to 200 - 275 for plaster pools and 175 - 225 for vinyl and fiberglass pools.

NOW USE THIS PRODUCT

Routine Maintenance

- 1 [With pump operating, apply 1 lb [(2, 8oz cups)] {for use if product is not in premeasured bag} of Shock Plus per 12,000 gallons directly into pool [***]] {and/or} [For small vinyl pools, with pump operating, apply 3.5 teaspoons of Shock Plus per 500 gallons or 1.3 ounces per 1,000 gallons directly into pool **] DO NOT pre-dissolve Shock Plus. DO NOT apply Shock Plus through skimmer or chemical feeding device as other chemicals may be present which could result in a violent reaction.
- 2 Wait at least 15 minutes after product application before entering pool *.
- 3 Operate pump and filter continuously for 4 to 8 hours after product addition.

4 For best results, apply Shock Plus weekly as part of your maintenance routine

[**Use a clean, dedicated spoon to dose the appropriate amount of product into the pool. Keep the dosage spoon stored out of reach of children. 3 teaspoons equals 1 tablespoon. 1 7/8 tablespoons equals 1 ounce.]

[***Always apply this product in its dry form using a clean dry plastic cup or scoop. Do not use this cup for any other purpose.] *{for use if product is not in premeasured bag}*

Additional Applications

Wind, rain, increased water temperature and the number and frequency of bathers can cause cloudy water, unpleasant odors or eye irritation which may require additional application(s) of this product. Follow routine maintenance instructions.

*** TEST CHLORINE LEVEL PRIOR TO RE-ENTRY. RE-ENTRY INTO TREATED SWIMMING POOLS IS PROHIBITED ABOVE LEVELS OF 4 PPM CHLORINE DUE TO RISK OF BODILY INJURY.**

[FOR POOL CLOSURE]

Apply Shock Plus at a rate of 1 lb per 6,000 gallons before closing pool for the winter. Apply an appropriate winter algaecide after addition of this product.]

{Directions to be used for shock application, Option B}

[How?]

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.

To Shock Water Clear

- Add [1 lb [(2, 8oz cups)] *{for use if product is not in premeasured bag}* per 12,000 gallons into the deepest pool area [***]] {or} [Add 3 5 teaspoons per 500 gallons or 1 3 ounces per 1,000 gallons directly into pool **] while filter and pump are operating
- DO NOT pre-dissolve, DO NOT apply through skimmer or chemical feeder, DO NOT mix with other chemicals, a violent reaction may result
- Wait at least 15 minutes after product application before entering pool *
- Operate pump and filter continuously for 4 to 8 hours after product addition
- Apply more product after heavy use, high temperatures, or rain. For best results, shock pool weekly
- [This product is not a sanitizer or [algaecide] {or} [algicide]. Use the appropriate product specifically formulated for sanitization or removing algae.]

[**Use a clean, dedicated spoon. Keep the spoon stored out of reach of children. 3 teaspoons equals 1 tablespoon. 1 ¾ tablespoons equals 1 ounce.]

[***Always apply this product in its dry form using a clean dry plastic cup or scoop. Do not use this cup for any other purpose.] *{for use if product is not in premeasured bag}*

*** TEST CHLORINE LEVEL PRIOR TO RE-ENTRY. RE-ENTRY INTO TREATED SWIMMING POOLS IS PROHIBITED ABOVE LEVELS OF 4 PPM CHLORINE DUE TO RISK OF BODILY INJURY.**

[To Close Pool

- Apply this product at a rate of 1 lb per 6,000 gallons into the deepest pool area while filter and pump are operating
- Apply an appropriate winter algaecide after addition of this product.]
- [Visit [the Aqua Chem Web Site] {or} [www.aquachem.com] {or} [the Pool Time website] {or} [www.pooltime.com] for complete pool closing instructions.]]

{Storage and Disposal directions when product is sold in bags }

[STORAGE AND DISPOSAL Keep this product dry in its original unopened bag until use For partially used bags, fold over top of bag and secure with adhesive tape Store unopened and partially used bags in a secure location away from children Store in a cool, dry, well ventilated area away from heat or open flame If product becomes damp, discard, following instructions for contamination under Physical or Chemical Hazards **CONTAINER DISPOSAL** Non-refillable container Do not reuse or refill this container Offer for recycling, if available Triple rinse container (or equivalent) promptly after emptying]

{Storage and Disposal directions when product is sold in bottles }

[STORAGE AND DISPOSAL Keep this product dry in original tightly closed container when not in use Store in a cool, dry, well ventilated area away from heat or open flame If product becomes damp, discard, following instructions for contamination under Physical or Chemical Hazards **CONTAINER DISPOSAL** Non-refillable container Do not reuse or refill this container Offer for recycling, if available Triple rinse container (or equivalent) promptly after emptying]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER Corrosive Causes irreversible eye damage Do not breathe dust, may be harmful if inhaled May be harmful if swallowed or absorbed through the skin Causes skin irritation Prolonged and frequently repeated skin contact may cause allergic reactions in some individuals Wear protective eyewear (safety glasses, goggles) and rubber gloves when handling this product Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet Remove and wash contaminated clothing before reuse

{First Aid will be separated by line rules from adjacent text and be in a different color }

FIRST AID 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 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 SWALLOWED** Call 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

Have the product container or label with you when calling a poison control center or doctor, or going for treatment [IN CASE OF MEDICAL EMERGENCY, CALL [1-303-623-5716] [1-877-800-5553] [telephone number supplied by supplemental registrant]]

Note to Physician Probable mucosal damage may contraindicate the use of gastric lavage

PHYSICAL OR CHEMICAL HAZARDS CONTAINS OXIDIZING AGENTS Do not mix with other chemicals or any other substance DO NOT pre-dissolve or add water to this product Always apply directly into the pool Contamination of this product with small amounts of water or other substances may start a chemical reaction and generate heat, hazardous gas, possible fire and explosion In case of contamination or decomposition, do not reseal [bag] [container] Isolate [bag] [container] in open air or well-ventilated area Flood [bag] [container] and area with large volumes of water In case of spills, scoop up and place product in pool water, then flood spilled area with large volumes of water

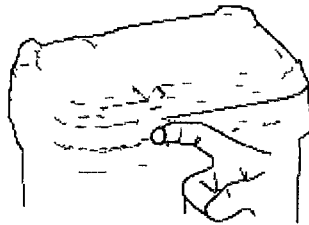
{Environmental hazards statement for end-use products in containers of less than 5 gallons (liquid) or less than 50 pounds (solid, dry weight) }

ENVIRONMENTAL HAZARDS This pesticide is toxic to fish and aquatic organisms

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

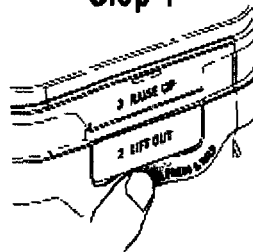
{label/67262-27 doc}

Tamper Evident Tear Strip
Tear away by using "ring pull" on either side of lid

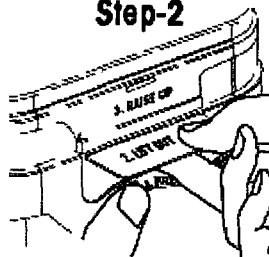


To open the lid (after the tear strip is removed)

Step-1



Step-2



Step-3

