

OCT 21 2002

Dana Lateulere
P.O. Box 357
Marbury, MD 20658

Subject: *Recreational Water Products, Inc,*
3 Inch Tabs
EPA Registration No. 67262-33
Application Dated: July 30, 2002
Receipt Date: July 31, 2002

Dear Ms. Lateulere:

This resubmission is in response to an Agency deficiency letter to Recreational Water Products, Inc. dated June 25, 2002. The Agency has decided that you have presented valid arguments to substantiate some of the proposed label language. Therefore, this label will be accepted with comments.

- *Add optional marketing statements to the front panel of the label.*
- *Modify the "Why to Use This Product" section of each set of use directions.*
- *Provide for an alternative spelling of algicide (algaecide) in the use directions.*
- *Replace "face shield" with "safety glasses" in the "Hazards to Humans and Domestic Animals" statement.*

Comments

1. *You must remove "with SUNSHIELD™ Protects chlorine from sunlight, so you use less" and all other references to SUNSHIELD™ from the label. It is not substantiated by any submitted data. It is not clear from this submission that cyanuric acid is released and actually protects the chlorine in the pool water from being lost in the atmosphere.*
2. *Add the number of tablets and sticks required for routine maintenance under the directions for use.*

1 Inch Tablets - "Add 16 ounces of this product (Approximately 23 tablets) per 10,000 gallons of pool water per week . . ."

CONCURRENCES							
SYMBOL	7510C						
SURNAME	Mitchell						
DATE	10-21-02						

3 Inch Tablets - "Add 16 ounces of this product (two tablets) per 10,000 gallons of pool water per week . . ."

Sticks - "Add 16 ounces of this product (two sticks) per 10,000 gallons of pool water per week . . ."

General Comments

A stamped copy of the label is enclosed. Submit three copies of your final printed labeling before distributing the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Wanda Mitchell at (703) 308-6345.

Sincerely,



*Robert S. Brennis
Product Manager - Team 32
Regulatory Management Branch II
Antimicrobials Division (7510C)*

{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.}

3 Inch Tabs

{Optional marketing statements that may be used with pool sanitization with any of the product forms on this label including: 1 inch tablets, 3 inch tablets or sticks.}

[Slow-Dissolving Sanitizer]

[Kills Bacteria]

[Controls Bacteria and Algae]

[Controls Algae]

[Kills Bacteria and Controls Algae]

[With built in scale preventative and sunlight protector]

[With built in corrosion preventative and sunlight protector]

[With built-in metal stain inhibitor, scale preventative, water softener and sunlight protector]

[With built-in Sunlight Protector]

~~[With SUNSHIELD™ Protects chlorine from sunlight, so you use less]~~

[With built-in metal stain inhibitor, scale preventative, water softener]

[Helps prevent corrosion & metal staining]

[Reduces Scale Formation]

[Makes water silky smooth]

[Softens Water]

[Protects pool equipment for longer life]

{Optional marketing statements that may be used with pool sanitization with 1 inch tablets.}

[Slow-Dissolving Sanitizer for Routine Use in Automatic Feeders or Floaters]

[For use in Automatic Feeders or Floaters]

[Multifunctional 1" Chlorinating Tablet]

{Optional marketing statements that may be used with pool sanitization with 3 inch tablets.}

[Slow-Dissolving Sanitizer for Routine Use in Automatic Feeders, Floaters, or Plastic Skimmers]

[For use in Automatic Feeders, Floaters or Plastic Skimmers]

[Multifunctional 3" Chlorinating Tablet]

{Optional marketing statements that may be used with pool sanitization with sticks.}

[Slow-Dissolving Sanitizer for Routine Use in Automatic Feeders, Floaters, or Plastic Skimmers]

[For use in Automatic Feeders, Floaters or Plastic Skimmers]

[Multifunctional Chlorinating Stick]

ACCEPTED
with COMMENTS
EPA Letter Dated:

OCT 21 2002

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 47262-33

Our Ingredients:	What They Do:
Chlorine	Sanitizes, Kills Bacteria, Controls Algae
[Sunlight Protector] [-] [SUNSHIELD™]	Protects chlorine from sunlight so you use less product than with unstabilized chlorines such as liquid bleach or calcium hypochlorite.
(Other Ingredients): Stain Inhibitor, Scale Preventative, Water Softener	Coats metal surfaces to protect against rusting and metal staining. Binds hard water components, reducing scaling and softening water

ACTIVE INGREDIENT: Trichloro-s-triazinetriene 94.05%
 OTHER INGREDIENTS: 5.95%
 TOTAL INGREDIENTS: 100.00%
 (Available Chlorine 84.65%)

KEEP OUT OF REACH OF CHILDREN
DANGER

FIRST AID: 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 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 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.

[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.

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

MANUFACTURED FOR:
 RECREATIONAL WATER PRODUCTS
 [AQUA CHEM DIVISION]
 [PoolTime Division]
 SCOTTDALE, GEORGIA

EPA REG. #67262-33
 EPA EST. # 5185-GA **ACCEPTED**
 with **COMMENTS**
 EPA Letter Dated:

NET WEIGHT:

OCT 21 2002

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act as
 amended, for the pesticide,
 registered under EPA Reg. No. 67262-33

{Directions to be used for pool sanitization with 1 inch tablets}

POOL SANITIZATION WITH 1 INCH TABLETS

WHY TO USE THIS PRODUCT: For use in feeders and floaters, this multifunctional sanitizer kills bacteria and controls algae, prevents metal staining and corrosion, reduces scale formation and softens water. It's unique additive actually coats metal surfaces, protecting them against rust. Additionally, this additive protects pool surfaces from metal stains and acts like a magnet to bind hard water components, making your pool water silky smooth. This sanitizer will last longer compared to chlorine products such as liquid bleach or calcium hypochlorite, as it contains ~~[SUNSHIELD™, which protects chlorine from sunlight, so you use less.]~~ ~~{or}~~ ~~[sunlight-protected chlorine.]~~ It's the perfect solution for clear, silky smooth, inviting pool water.

IMPORTANT NOTES:

1. Shock your pool every week and also after heavy rain or heavy use to help keep your pool water properly maintained.
2. Sunlight, rainfall, temperature, number of swimmers, and frequency of pool use affect the rate of chlorine residual loss. Adjust cleaning and chemical maintenance accordingly.
3. Use this product in an automatic feeder or floater designed for this product.
4. Do not add other chemicals into the feeder or floater where this product is in use as a fire or explosion may occur.
5. To avoid damage to pool surface or materials do not allow product to come in direct contact with these materials. Do not throw tablets directly into pool.

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 pool equipment is working properly. Adjust stabilizer levels to 40-50 PPM with stabilizer.
2. Test the water's pH, alkalinity, and calcium hardness and adjust to the correct level. Adjust pH to 7.2-7.6. Adjust alkalinity to 80-125 PPM for plaster pools and 125-150 for vinyl or fiberglass pools. Adjust calcium hardness to 200-275 PPM for plaster pools, 175-225 for vinyl or fiberglass pools. Be sure to follow label directions when using other products as outlined in directions for this product.
3. Check the free available chlorine level and adjust to 1-3 PPM by adding a granular chlorinating product.

**ACCEPTED
with COMMENTS
EPA Letter Dated:**

OCT 21 2002

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 67262-33

**NOW USE THIS PRODUCT
START-UP/INITIAL TREATMENT:**

1. If water is cloudy or green, superchlorinate pool with appropriate shock product until pool is clear.
2. Add 16 ounces of this product (approximately 23 tablets) per 10,000 gallons of pool water to feeder or floater and then test for the free available chlorine level (allow water to circulate at least 4 hours before testing). Adjust the feeder or floater following manufacturer's instructions to establish a free available chlorine level between 1-3 PPM.
3. When free available chlorine level is adjusted to 1-3 ppm, add the [algicide] {or} [algaecide] appropriate to your needs.

ROUTINE MAINTENANCE: *(approximately 23 tablets)*
Add 16 ounces of this product per 10,000 gallons of pool water per week, or as often as needed, to the floater or feeder to maintain a constant free available chlorine level of 1-3 PPM. Sunlight, rainfall, temperature, number of swimmers, and frequency of pool use affect the rate of chlorine residual loss so check the floater or feeder often and refill as needed.

ACCEPTED
with COMMENTS
EPA Letter Dated:
OCT 21 2002

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide
registered under EPA Reg. No. 67262-33

{Directions to be used for pool sanitization with 3 inch tablets}

POOL SANITIZATION WITH 3 INCH TABLETS

WHY TO USE THIS PRODUCT: For use in feeders, floaters or skimmers, this multifunctional sanitizer kills bacteria and controls algae, prevents metal staining and corrosion, reduces scale formation and softens water. It's unique additive actually coats metal surfaces, protecting them against rust. Additionally, this additive protects pool surfaces from metal stains and acts like a magnet to bind hard water components, making your pool water silky smooth. This sanitizer will last longer compared to chlorine products such as liquid bleach or calcium hypochlorite, as it contains ~~[SUNSHIELD™, which protects chlorine from sunlight, so you use less.]~~ ~~{or} [sunlight-protected chlorine.]~~ It's the perfect solution for clear, silky smooth, inviting pool water.

IMPORTANT NOTES:

1. Shock your pool every week and also after heavy rain or heavy use to help keep your pool water properly maintained.
2. Sunlight, rainfall, temperature, number of swimmers, and frequency of pool use affect the rate of chlorine residual loss. Adjust cleaning and chemical maintenance accordingly.
3. Use this product in an automatic feeder, floater, or skimmer designed for this product.
4. Do not add other chemicals into the feeder, floater, or skimmer where this product is in use as a fire or explosion may occur. Use this product in a skimmer only if the skimmer and the piping between skimmer and pump are plastic. In vinyl pools, do not leave the pump turned off for more than 8 hours when this product is in the skimmer. If the pump is off for more than 8 hours, bleaching and damage to liner may occur.
5. To avoid damage to pool surface or materials do not allow product to come in direct contact with these materials. Do not throw tablets directly into pool.

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 pool equipment is working properly. Adjust stabilizer levels to 40-50 PPM with stabilizer.
2. Test the water's pH, alkalinity, and calcium hardness and adjust to the correct level. Adjust pH to 7.2-7.6. Adjust alkalinity to 80-125 PPM for plaster pools and 125-150 for vinyl or fiberglass pools. Adjust calcium hardness to 200-275 PPM for plaster pools, 175-225 for vinyl or fiberglass pools. Be sure to follow label directions when using other products as outlined in directions for this product.
3. Check the free available chlorine level and adjust to 1-3 PPM by adding a granular chlorinating product.

ACCEPTED
with COMMENTS
EPA Letter Dated:

OCT 21 2002

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 67262-3

**NOW USE THIS PRODUCT
START-UP/INITIAL TREATMENT:**

1. If water is cloudy or green, superchlorinate pool with appropriate shock product until pool is clear.
2. If using a feeder or floater, add 16 ounces of this product (two tablets) per 10,000 gallons of pool water to feeder or floater and then test for the free available chlorine level (allow water to circulate at least 4 hours before testing). Adjust the feeder or floater following manufacturer's instructions to establish a free available chlorine level between 1-3 PPM.
3. If using a plastic skimmer, add 16 ounces of this product (two tablets) per 10,000 gallons of pool water and test for the free available chlorine level (allow water to circulate at least 4 hours before testing), adding more tablets as necessary to establish a free available chlorine level of 1-3 PPM.
4. When free available chlorine level is adjusted to 1-3 ppm, add the [algicide] {or} [algacide] appropriate to your needs.

ROUTINE MAINTENANCE: *(two tablets)*

Add 16 ounces of this product per 10,000 gallons of pool water per week, or as often as needed, to the floater, feeder or skimmer to maintain a constant free available chlorine level of 1-3 PPM. Sunlight, rainfall, temperature, number of swimmers, and frequency of pool use affect the rate of chlorine residual loss so check the floater, feeder or skimmer often and refill as needed.

ACCEPTED
with COMMENTS
EPA Letter Dated:

OCT 21 2002

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 67262-33

{Directions to be used for pool sanitization with sticks}

POOL SANITIZATION WITH STICKS

WHY TO USE THIS PRODUCT: For use in feeders, floaters or skimmers, this multifunctional sanitizer kills bacteria and controls algae, prevents metal staining and corrosion, reduces scale formation and softens water. It's unique additive actually coats metal surfaces, protecting them against rust. Additionally, this additive protects pool surfaces from metal stains and acts like a magnet to bind hard water components, making your pool water silky smooth. This sanitizer will last longer compared to chlorine products such as liquid bleach or calcium hypochlorite, as it contains ~~[SUNSHIELD™, which protects chlorine from sunlight, so you use less.]~~ ~~for~~ ~~[sunlight-protected chlorine.]~~ It's the perfect solution for clear, silky smooth, inviting pool water.

IMPORTANT NOTES:

1. Shock your pool every week and also after heavy rain or heavy use to help keep your pool water properly maintained.
2. Sunlight, rainfall, temperature, number of swimmers, and frequency of pool use affect the rate of chlorine residual loss. Adjust cleaning and chemical maintenance accordingly.
3. Use this product in an automatic feeder, floater, or skimmer designed for this product.
4. Do not add other chemicals into the feeder, floater, or skimmer where this product is in use as a fire or explosion may occur. Use this product in a skimmer only if the skimmer and the piping between skimmer and pump are plastic. In vinyl pools, do not leave the pump turned off for more than 8 hours when this product is in the skimmer. If the pump is off for more than 8 hours, bleaching and damage to liner may occur.
5. To avoid damage to pool surface or materials do not allow product to come in direct contact with these materials. Do not throw sticks directly into pool.

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 pool equipment is working properly. Adjust stabilizer levels to 40-50 PPM with stabilizer.
2. Test the water's pH, alkalinity, and calcium hardness and adjust to the correct level. Adjust pH to 7.2-7.6. Adjust alkalinity to 80-125 PPM for plaster pools and 125-150 for vinyl or fiberglass pools. Adjust calcium hardness to 200-275 PPM for plaster pools, 175-225 for vinyl or fiberglass pools. Be sure to follow label directions when using other products as outlined in directions for this product.
3. Check the free available chlorine level and adjust to 1-3 PPM by adding a granular chlorinating product.

ACCEPTED
with COMMENTS
EPA Letter Dated:

OCT 21 2002

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended for the pesticide,
07242-3

**NOW USE THIS PRODUCT
START-UP/INITIAL TREATMENT:**

1. If water is cloudy or green, superchlorinate pool with appropriate shock product until pool is clear.
2. If using a feeder or floater, add 16 ounces of this product (two sticks) per 10,000 gallons of pool water to feeder or floater and then test for the free available chlorine level (allow water to circulate at least 4 hours before testing). Adjust the feeder or floater following manufacturer's instructions to establish a free available chlorine level between 1-3 PPM.
3. If using a plastic skimmer, add 16 ounces of this product (two sticks) per 10,000 gallons of pool water and test for the free available chlorine level (allow water to circulate at least 4 hours before testing), adding more sticks as necessary to establish a free available chlorine level of 1-3 PPM.
4. When free available chlorine level is adjusted to 1-3 ppm, add the [algicide] {or} [algacide] appropriate to your needs.

ROUTINE MAINTENANCE:

(two sticks)
Add 16 ounces of this product per 10,000 gallons of pool water per week, or as often as needed, to the floater, feeder or skimmer to maintain a constant free available chlorine level of 1-3 PPM. Sunlight, rainfall, temperature, number of swimmers, and frequency of pool use affect the rate of chlorine residual loss so check the floater, feeder or skimmer often and refill as needed.

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EPA Letter Dated:

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Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 67262-3:

Reentry into treated swimming pools is prohibited when free available chlorine levels are above 3 PPM due to risk of body injury.

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. Moisture may decompose this product and cause a violent reaction leading to fire and explosion. In case of decomposition, isolate container if possible and flood area with large amounts of water to dissolve all material before discarding this container. Do not contaminate food or feed by storage or disposal. **CONTAINER DISPOSAL:** Do not reuse container, but place in trash collection. Rinse thoroughly before discarding in trash.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: DANGER: Corrosive: Causes irreversible eye damage and skin burns. May be fatal if absorbed through skin. May be fatal if inhaled. Do not breathe dust or fumes. Irritating to nose and throat. Harmful if swallowed. Do not get in eyes, on skin or on clothing. Wear goggles or safety glasses, protective clothing and rubber gloves when handling this product. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse.

PHYSICAL OR CHEMICAL HAZARDS: CONTAINS A 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. When using automatic feeding devices, always follow manufacturer's directions as to the proper addition of sanitizer product to chlorinators. 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 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.

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

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

{Environmental hazards statement for end-use products in containers 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 local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.]

ACCEPTED
with COMMENTS
EPA Letter Dated:

OCT 21 2002

12 8 12

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

[NOTE: Any questions or comments about Aqua Chem Products?]

[In the continental U.S. call 1-800-252-POOL (7665). Ask for your free pool care booklet.]

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

[Visit Aqua Chem's Internet Web Site at <http://www.aquachem.com>]

[Visit PoolTime's Internet Web Site at <http://www.pooltime.com>]

{label/67262-33.doc}

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With COMMENTS
EPA Letter Dated:

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Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 67262-33