

03/22/2005

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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67262-37

MAR 22 2005

Recreational Water Products, Inc.  
P.O. Box 1449  
Buford, GA 30515-1449

Subject: DuoTab  
EPA Registration Number 67262-37  
Application Date: 1/31/05  
Receipt Date: 2/2/05

Dear Mr. Jernigan:

This responds to your letter dated January 31, 2005 with regards to changing the ppm levels from 4 ppm to 3 ppm of available chlorine.

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the conditions listed below:

- To make minor label changes to the "Precautionary Statements" and "Directions for Use"

**Conditions**

The "Reentry Level" for the Chlorinated Isocyanurates products are 3 ppm. Reentry into treated pools is prohibited above levels of 3 ppm due to risk of bodily harm.

**General Comments**

A stamped copy of the accepted labeling is enclosed. Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

**CONCURRENCES**

SYMBOL	7510C	7510C						
SURNAME	Jew	Mitchell						
DATE	4/5/05	4/5/05						

Should you have any questions or comments concerning this letter, please contact  
Delores Williams at (703) 308-6372.

Sincerely,

ESI

Emily H. Mitchell  
Product Manager 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.}

## DuoTab™

{Optional marketing statements that may be used.}

[Dual Layer Tablet]  
 [Contains Blue Power Shock Layer and Sanitizer]  
 [Multipurpose Layered [Tab] [Tablet] [Puck]]  
 [[New] [Patented] Technology]  
 [Patented Shock Technology]  
 [2 in 1 Chlorine Technology]  
 [2 in 1 Chlorine Product]  
 [Saves [Time] [Steps]]  
 [Patented Sanitizer and Shock Technology]  
 [Dual Action Tablets]  
 [Dual Action Chlorinating Tablets]  
 [2 in 1 Chlorinating Product]  
 [Shocks and Sanitizes in 1 Easy Step]  
 [Maintains clear water when used as directed]  
 [Do not mix with other products]  
 [Easy to use non-staining tablets]  
 [Simplified Pool Care]  
 [Slow Dissolving Sanitizer [for use in skimmers]]  
 [Fast Dissolving Shock [Layer] with Long Lasting Sanitizer [Layer]]  
 [New chlorine sanitizer, [shock], [oxidizer], [clarifier], [water softener], and [metal stain inhibitor]]  
 [[Multifunctional Chlorinating tablets] [with built-in sanitizer, shock, oxidizer, clarifier, water softener, and metal stain inhibitor]]  
 [Contains Sanitizer]  
 [Contains Pool Sanitizer]  
 [Contains Routine Sanitizer]  
 [Routine Sanitizer and Shock]  
 [Multifunctional Shock and Sanitizer]  
 [Contains Fast Dissolving Shock]  
 [[New] Chlorine Sanitizer and Shock]  
 [Kills Bacteria]  
 [Controls Bacteria and Algae]  
 [Controls Algae]  
 [Kills Bacteria and Controls Algae]  
 [Helps Prevent Corrosion / Metal Staining]  
 [Softens Water]  
 [Makes water silky smooth]  
 [Reduces Scale Formation]  
 [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]

ACCEPTED  
 with COMMENTS  
 EPA Letter Dated:

MAR 22 2005

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

67262-37

[8-in-1 Chlorinating Tablets with built-in clarifier, corrosion inhibitor, sunlight protector, oxidizer, water softener, shock, sanitizer, and filter enhancer]

**ACTIVE INGREDIENTS:**

Trichloro-s-triazinetriene .....	70.54%
Sodium dichloro-s-triazinetriene .....	14.55%
OTHER INGREDIENTS [(clarifier, oxidizer, water softener)]: ...	14.91%
TOTAL INGREDIENTS: .....	100.00%

(Available Chlorine 74%)

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**

**FIRST AID: IF IN EYES:** Hold eyelids open and rinse slowly and gently with cold 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. If irritation persists, 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. **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.

**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.

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

MANUFACTURED FOR:  
RECREATIONAL WATER PRODUCTS  
[AQUA CHEM DIVISION]  
[PoolTime Division]  
PO Box 1449  
Buford, GA 30515-1449

EPA REG. # 67262-37  
EPA EST. # 5185-GA-1

NET WEIGHT:

*{Directions to be used for pool sanitization tablets, Option A}*

**POOL SANITIZATION WITH [DUOTAB™] TABLETS**

**WHY TO USE THIS PRODUCT:** [This specially formulated [patented] product is a blend of oxidizers, clarifiers, and sanitizers that help keep your pool water sparkling clear. DuoTab™ is an easy-to-use tablet that combines shock and sanitizer into one [product] {or} [puck] {or} [tab] {or} [tablet], making pool care more convenient.] [This tablet releases sufficient chlorine to reduce the growth of algae and kill bacteria in your pool.]

*{or}*

[DuoTab™ is an easy-to-use tablet that combines shock and sanitizer into one [product][tablet]. This unique product:

- Kills bacteria and controls algae
- Shocks and sanitizes
- Softens and clarifies swimming pool water]

**IMPORTANT NOTES:**

1. When using other products as outlined in the directions for this product, always follow label directions for those products.
2. Shock your pool [with a granular chlorinating product] {or} [Chlorinating Granules Plus™] after heavy rain or heavy use to help keep your pool water properly maintained.
3. Sunlight, rainfall, temperature, number of swimmers, and frequency of pool use affect the rate of free available chlorine level loss. Adjust cleaning and chemical maintenance accordingly.
4. Do not add other chemicals through the skimmer when using this product – an explosion may occur. Use this product in skimmer only.
5. To avoid damage to pool surface, pool equipment, pool toys, pool furniture, etc., do not allow product to come in direct contact with these items. Do not throw tablets directly into pool.
6. Longer pump operation time or higher flow rates through the skimmer will produce higher chlorine levels. Test frequently during initial use to determine best way to apply the product to your 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:] {or} [WATER BALANCE:]**

1. Ensure all pool equipment is working properly. Adjust stabilizer levels to 30-40 PPM with stabilizer.
2. All skimmers should be free of debris and / or any obstructions that may interfere with skimmer operation.
3. Test the water's pH, alkalinity, and calcium hardness with test kit or test strips and adjust to the correct levels: pH is 7.2-7.6; total alkalinity is 80-125 PPM for plaster pools and 125-150 for vinyl or fiberglass pools; and calcium hardness is 200-275 PPM for plaster pools and 175-225 for vinyl or fiberglass pools. Be sure to follow label directions when using other products as outlined in directions for that product.
4. If water is cloudy or green, superchlorinate pool with appropriate [shock product] {or} [granular chlorinating product] {or} [Chlorinating Granules Plus™] until pool is clear and a free available chlorine level of at least 1 ppm is established.

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**[NOW USE THIS PRODUCT]**

**[START-UP/INITIAL TREATMENT:]**

**[GETTING STARTED:]**

1. If there are multiple skimmers, divide the [pucks] {or} [tabs] {or} [tablets] evenly among the skimmers. Make sure skimmers are free of debris.
2. With free available chlorine level of at least 1 ppm, add two (2) tablets per 10,000 gallons to pool water. Test the free available chlorine level using a test kit or test strips before entering the pool. Do not enter pool if free available chlorine level is above 4 ppm.
3. Operate pump for two (2) hours after product addition to ensure shock layer dissolves completely.
4. Circulation, flow rate, hours of pump operation, and water temperature will affect the recommended additions of [this product] {or} [DuoTab™]. For best results operate pump 8 - 12 hours per day. If pump run times exceed 12 hours per day, before adding additional tablets, test free available chlorine level. If your free available chlorine level is above 4 ppm, do not add additional tablets. Adjust the frequency of application in order to maintain a chlorine level of 1-4 ppm.
5. Do not remove tablet remnants from skimmer basket(s). Simply add additional tablet(s) as needed.
6. When free available chlorine level is adjusted to 1-4 ppm, add a maintenance [algicide] {or} [algaecide] as needed.

**[ROUTINE MAINTENANCE: ]**

**[REGULAR USE:]**

1. Check free available chlorine level at least twice a week and add additional [DuoTab™] [pucks] {or} [tabs] {or} [tablets] to skimmer as needed to maintain a chlorine level of 1-4 ppm.
2. Sunlight, rainfall, temperature, number of swimmers, and frequency of pool use affect the rate of chlorine level loss so check [skimmer] [chlorine level] at least twice a week.

**Reentry into treated swimming pools is prohibited when free available chlorine levels are above 4 PPM due to risk of bodily injury.**

*{Directions to be used for pool sanitization tablets, Option B}*

**WHY TO USE THIS PRODUCT:** This specially formulated [patented] product is a blend of oxidizers, clarifiers, and sanitizers that help keep your pool water sparkling clear. DuoTab™ is an easy-to-use tablet that combines shock and sanitizer into one [product] {or} [puck] {or} [tab] {or} [tablet], making pool care more convenient. [This tablet releases sufficient chlorine to reduce the growth of algae and kill bacteria in your pool.] [This unique product kills bacteria and controls algae, shocks and sanitizes, and softens and clarifies swimming pool water.]

**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.

Ensure all pool equipment is working properly. Superchlorinate pool so that a free available chlorine level of at least 1 ppm is established. Add stabilizer to establish a minimum stabilizer level of 30-40 ppm. When using other products as outlined in the directions for this product, always follow label directions for those products.

**WATER BALANCE:** Optimum product performance and swimmer comfort will be achieved if you test, adjust and maintain the following: pH between 7.2-7.6, alkalinity between 125-150 ppm for all pool types, calcium hardness between 200-275 for plaster pools, and 175-225 ppm for vinyl and fiberglass pools.

**NOTE:** DO NOT mix this product with any other products or chemicals. DO NOT throw tablets directly into the pool. Make sure skimmers are free of debris. If there are multiple skimmers, divide the [pucks] {or} [tabs] {or} [tablets] evenly among the skimmers.

**INITIAL APPLICATION:** Add two (2) tablets per 10,000 gallons to skimmer. Test the free available chlorine level using a test kit or test strips before entering the pool. Do not enter pool if free available chlorine level is above 4 ppm. Operate pump for two hours after product addition to ensure shock layer dissolves completely. If pump run times exceed 12 hours per day, before adding additional tablets, test free available chlorine level. If your free available chlorine level is above 4 ppm, do not add additional tablets. Adjust the frequency of application in order to maintain a chlorine level of 1-4 ppm.

**ROUTINE CHLORINATION:** Add sufficient [DuoTab™] tablets to skimmer to maintain a constant free available chlorine level of 1-4 ppm. Check free available chlorine level at least twice a week and add additional [pucks] {or} [tabs] {or} [tablets] as needed to maintain a chlorine level of 1-4 ppm. The amount of product required and frequency of addition will vary with the number of swimmers, sunlight, rainfall, and water temperature, so check chlorine level at least twice a week. For best results operate pump for 8 - 12 hours per day.

**Reentry into treated swimming pools is prohibited when free available chlorine levels are above 4 PPM due to risk of bodily injury.**

**STORAGE AND DISPOSAL:**

**STORAGE :** 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.

**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. Harmful if swallowed or absorbed through skin. Do not get in eyes, on skin or on clothing. Wear 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 and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

**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. Use clean dry utensils. Do not add other chemicals through the skimmer when using this product- an explosion might occur. Do not add this product to any dispensing device. 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.]

**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>]**