

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

OCT 26 2006



United States  
Environmental Protection  
Agency

Office of Pesticide Programs

Zodiac Pool Care, Inc  
2028 N. W. 25<sup>th</sup> Avenue  
Pompano Beach, FL 33069

AGENT: Scientific and Regulatory Consultants, Inc.  
P. O. Box 1014  
Columbia City, IN 46725

Attention: Ann M. Cozad  
Regulatory Affairs

**Subject: Nature G45-VC40**  
EPA Registration No. 67712-1  
Notification Dated September 26, 2006

This will acknowledge receipt of your notification to add optional marketing text and graphic to the Master Label, submitted under the provisions of FIFRA Section 3(c)(9). Based on a review of the submitted material, the following comments apply.

The Notification dated September 26, 2006 is in compliance with PR Notice 98-10 and is acceptable. This information has been made a part of your file.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely

A handwritten signature in black ink that reads "M Swindell".

Marshall Swindell  
Product Manager (33)  
Regulatory Management Branch 1  
Antimicrobials Division (7510P)



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 67712-1	2. EPA Product Manager M. Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Nature2 G45-VC40	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Zodiac Pool Care, Inc. 2028 N. W. 25th Avenue Pompano Beach, FL 33069 <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.)**

Notification of text and graphic additions through PR Notice 98-10.  
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 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.

se contact Ann Cozad at acozad@sroconsultants.com or at 260-244-6273 (fax) with any questions.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> on label	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input 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 Ann M. Cozad	Title Agent for Zodiac Pool Care, Inc.	Telephone No. (Include Area Code) (260) 244-6270
<b>Certification</b> 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)
Signature 	3. Title Agent for Zodiac Pool Care, Inc.	
4. Typed Name Ann M. Cozad	5. Date September 26, 2006	

3 8 7

**SRC**  
*Scientific & Regulatory*  
Consultants, Inc.

September 26, 2006

Mr. Marshall Swindell, PM-33  
Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

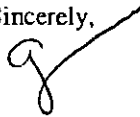
SUBJECT: Notification of minor label change per PR Notice 98-10  
Nature<sup>20</sup> G45-VC40  
EPA Reg. No. 67712-1

Dear Marshall:

On behalf of Zodiac Pool Care, Inc. ("Zodiac"), enclosed is a notification to add optional marketing text and graphics to the Master Label for Nature<sup>20</sup> G45-VC40 (EPA Reg. No. 67712-1). The optional text and graphics, are detailed in the tables on pages 2 - 5 of this notification. The tables show the pages where text/graphic will be inserted, the original approved text/graphic (where applicable) and the new text/graphic.

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.

Thank you for your assistance in this matter. If you have any questions regarding this notification please feel free to contact our office at (260) 244-6270.

Sincerely,  


Ann M. Cozad  
Scientific & Regulatory Consultants, Inc.  
Agent for Zodiac Pool Care, Inc.



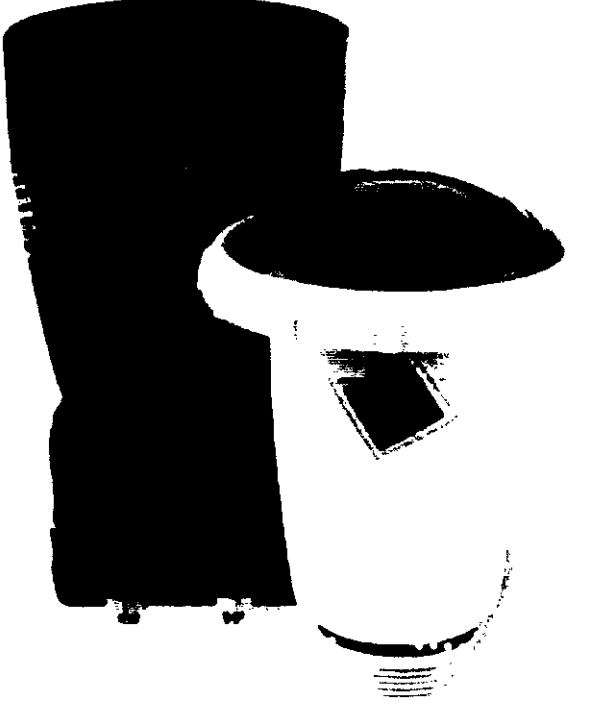
Nature<sup>2</sup> G45-VC40 EPA Reg. No. 67712-1 Label Notification

CHANGES TO CARTON LABEL

LOCATION	DESCRIPTION	ACCEPTED LANGUAGE	CHANGE
Global	Add optional text.	NA	Use the terms "in-ground" and "inground" interchangeably
Global	Add optional text	NA	Use the term "this unit" interchangeably with the product name throughout the label
Pg. 2	Add optional text	NA	Made in USA
Pg. 2	NA	NA	Updated corporate address
Pg. 4	Add optional text	Enhanced swimmer comfort	Enhance[s, d] swimmer comfort
Pg. 4	Add optional text	The Nature <sup>2</sup> System* improves water quality	The Nature <sup>2</sup> System* with CRT improves water quality
Pg. 4	Add optional text	Destroys bacteria and algae growth	Destroys bacteria and algae growth with CRT
Pg. 4	Add optional text	To keep your patented Nature <sup>2</sup> Sanitizer operating properly, it is necessary to change this cartridge every [six, four] months.	To keep your patented Nature <sup>2</sup> Sanitizer operating properly, it is necessary to change [this, the] cartridge every [six, four] months.
Pg. 4	Add optional text	NA	Controlled Release Technology (CRT) controls the release of silver and copper mineral ions into your pool water.
Pg. 4	Add optional text	NA	Controlled Release Technology
Pg. 6	Add optional text	Installation is simple.	Simple, Do-It-Yourself Installation
Pg. 6	Add optional text	In just minutes you can install Nature <sup>2</sup> Express, activate the cartridge, and start enjoying a crystal clear Nature <sup>2</sup> pool. Nature <sup>2</sup> Express fits most aboveground [inground] pools up to 25,000 gallons [with 1 1/2" or 2" rigid PVC plumbing].	In just minutes you can install Nature <sup>2</sup> Express, activate the cartridge, and start enjoying a crystal clear [Nature <sup>2</sup> ] pool. Nature <sup>2</sup> Express fits most [aboveground, inground] pools up to 25,000 gallons [with 1 1/2" or 2" rigid PVC plumbing].
Pg. 6	Add optional text	Nature <sup>2</sup> Express contains no moving parts and is unaffected by heavy use, hot weather and water temperature. You only have to change the replaceable cartridge every six months! Please refer to the operating manual for complete installation instructions.	[Nature <sup>2</sup> Express, This unit] contains no moving parts [and is unaffected by heavy use, hot weather and water temperature] [and only requires replacing the cartridge every [six, four] months]. [You only have to change the replaceable cartridge every [six, four] months!] Please refer to the operating manual for complete installation instructions.
Pg. 6	Add optional text	Turn pool pump off. Secure clamp assembly on the return line. [For aboveground pools with corrugated pipe, use PVC adapter provided.]	Turn pool pump off. Secure clamp assembly on the return line. [For aboveground pools with corrugated pipe, use PVC [enclosed] adapter [provided].]
Pg. 6	Add optional text	Cut hole in rigid PVC pipe using a power drill and the hole saw that is provided.	Cut hole in rigid PVC pipe using a power drill and the [enclosed] hole saw [that is provided].
Pg. 6	Add optional text	Thread the cartridge into the clamp, turn on pool pump and activate the cartridge. Refer to your cartridge owner's manual for start up instructions.	Thread the cartridge into the clamp, turn on pool pump and activate the cartridge. [See] [Refer to your cartridge owner's] manual for start up instructions.

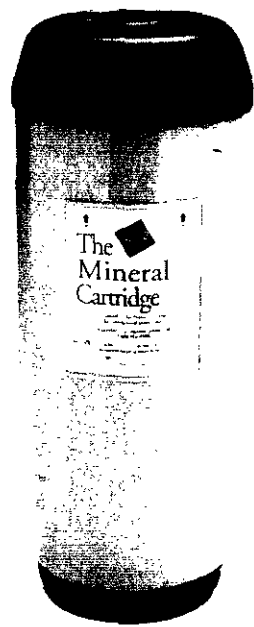

Nature<sup>2</sup> G45-VC40 EPA Reg. No. 67712-1 Label Notification

CHANGES TO CARTON LABEL

LOCATION	DESCRIPTION	ACCEPTED LANGUAGE	CHANGE
Pg. 2	Add graphic	NA	
Pg. 4	Add graphic	NA	
Pg. 7	Add graphic	NA	

Nature<sup>2</sup> G45-VC40 EPA Reg. No. 67712-1 Label Notification

CHANGES TO CARTON LABEL

LOCATION	DESCRIPTION	ACCEPTED LANGUAGE	CHANGE
Pg. 9	Add graphic	NA	
Pg. 9	Add graphic	NA	

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Nature<sup>2</sup> G45-VC40 EPA Reg. No. 67712-1 Label Notification

CHANGES TO CARTON LABEL

LOCATION	DESCRIPTION	ACCEPTED LANGUAGE	CHANGE
Pg. 9	Add graphic	NA	