

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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Mr. David Swain Regulatory Specialist for, Zodiac Pool Systems, Inc. 6000 Condor Drive Moorpark, CA 93021

JUL 28 2010

Subject: Nature<sup>2</sup> AG

EPA Registration Number 67712-5 Your Amendment Dated June 1<sup>st</sup>, 2010 EPA Received Date June 2<sup>nd</sup>, 2010

The amendment referred to above, submitted in connection with registration under the Federal Inseciticide, Fungicide, and Rodenticide Act, FIFRA, as amended, to add additional brand name, label claims, and to change the company name and address, is acceptable provided you make the following labeling revisions:

On page 3, delete the term(s), Around, Round, 24/7 the clock where ever it appears on the product labeling.

On page 3, delete the term(s), Constant/Consistent from the product labeling. It implies that the product, after one application, works continuously.

On page 3, delete the phrase the Cartridge meets EPA pool efficacy requirements. Since the product is registered with the Agency, it is understood that the data generated in support of the product meets all EPA data guideline requirements and has been reviewed and found to be acceptable.

On page 3, delete the phrase hassle, trouble free algae control. It implies that the product will eliminate all problems pertaining to one's algae control problems.

On page 3, revise the statement, Destroys bacteria....with CRT to read Destroys bactera\*... with CRT. On the bottom of the page or back panel of the labeling, insert the \* symbol and list all the organisms that the product is efficacious against.

On page 4, delete the statement, It works for you, from the product labeling. It implies that the product works on algae containment problems.

On page 4, delete the statement, It works while you [sleep, play, swim], from the labeling. It implies that the product can be applied to the pool and works with not having to apply another dose. It also implies that the applicator can apply it and no maintenance can be done.

On page 4, delete the statement, Maintenance. Management free algae control, from the product labeling. It implies that after applications, the applicator does not have to perform maintenance, and/or management.

On page 4, insert \* symbol directly after the term bacteria. Place in the back panel the \* symbol, and list the organisms.

On page 5, delete the phrases, "fight, defend against, suppress, resist" algae. According to the 40 CFR, these terms are not included in the definition of the "pesticide".

On page 5, delete the statement, "enhanced water quality", from the product labeling. It implies that the quality of the municipally treated water has been enhanced.

On page 5, delete the statement, controls release of active ingredients, from the labeling. The release of the active ingredients does not impact the effectiveness of the product. The total formulation impacts the effectiveness of the product.

On page 5, revise the statement, Nature<sup>2</sup> provides silver....range to read Nature<sup>2</sup> provides silver and Copper Sulfate pentrahydrate.....range. Both active ingredients impart a reaction to destroy bacteria.

On page 5, revise the statement, Silver destroys bacteria to reduce.....50%\*, to read as follows, Silver destroys bacteria\* to reduce.....50%. On the bottom of the page or on the back panel, insert \* and list organisms.

On page 5, delete the terms, creators of, inventors of, pioneers in pool mineral technology. It implies that the Nature2 product is the only product on the market that is an effective algacide for swimming pools.

On the bottom of page 5, delete the term, "antimicrobial properties", from the product labeling.

On the bottom of page 5, delete the statement, "Nature2 brings the benefits of these elemental ingredients to create pool water.....noticeably cleaner, clearer and softer", from the product labeling. It implies that the ingredients impart efficaciousness instead of the total formulation.

On page 9, revise the statement, Six, four month guarantee, to read as follows: specify the exact amount of time, either six or four month guarantee instead of a range.

The alternate brand name, Nature<sup>2</sup> Fusion, is acceptable.

A stamped copy of the labeling is enclosed for your records.

If you have questions concerning this letter, please contact Karen M. Leavy at (703)-308-6237.

Sincerely,

Marshall Swindell

Product Manager 33

Regulatory Management Branch I Antimicrobials Division(7510P)

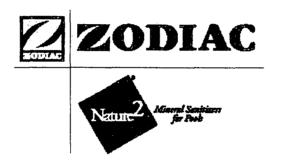
ACTIVE INGREDIENTS:
Metallic Silver**2.33%
Copper Sulfate pentahydrate***9.43%
(CAS No. 7758-99-8)
OTHER INGREDIENTS88.24%
TOTAL100.00%
**From Silver Nitrate
*** Copper (Cu) as metallic 2.40%

\*The Nature<sup>2</sup> System consists of the patented Nature<sup>2</sup> technology<sup>†</sup> used in conjunction with a chlorine delivery device or 0.5ppm of an EPA registered chlorine pool product.

<sup>†</sup> Nature<sup>2</sup> technology consists of the minerals silver and copper.

# KEEP OUT OF REACH OF CHILDREN CAUTION

SEE [BACK, SIDE, REAR] PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS



# Nature<sup>2®</sup> AG

EPA Reg. No. 67712-5 EPA Est. No. 67712-CA-001

NET CONTENTS: [ONE CARTRIDGE] [ONE UNIT]

ACCEPTED
with COMMENTS
EPA Letter Dated:

Under the Federal Insecticide, Fungicide, and Rodenticide Act as an annual for the pesticide, registered under EPA Reg. No. 67712-5

Note: Bracketed [] information is optional text/picture/diagram. Text separated by a comma (,) denotes and/or options. {Bracket Text} is for administrative purposes. Punctuation, text size, text font, text color, capital letters, lower case letters, italics, bold and underline may vary on final printed labels. Spelling may vary when alternate spelling is acceptable; for example "algaecide" or "algicide" Page 1 of 26

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#### CHANGE THIS CARTRIDGE EVERY [SIX, FOUR] MONTHS

[one of the following statements will appear]

Use of this cartridge [for] longer than [four, six] continuous months will void the warranty. Discard [the, this] cartridge at the end of [six, four] months.

(or)

Nature<sup>2</sup> AG lasts one season (up to [six, four] months). Discard Nature<sup>2</sup> AG at the end of the season.

#### PRECAUTIONARY STATEMENT

#### Hazards to Humans and Domestic Animals

#### Caution

In the unlikely event that a cartridge breaks, mineral media should not be ingested by humans or animals as it may cause gastric distress.

#### **FIRST AID**

IF INGESTED: Call poison control center or doctor immediately for treatment advice.

#### DISPOSAL

After [six, four months] [one season] of use, discard [the cartridge, Nature<sup>2</sup>, {product name}] in household trash. Do not save [the cartridge, Nature<sup>2</sup>, {product name}] is manufactured with the mineral media sealed inside. In the unlikely event [it, the cartridge, Nature<sup>2</sup>, {product name}] breaks, remove [it, the cartridge] and vacuum out any media introduced into the pool [water].

#### DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

See owner's manual inside box for directions for use.

Zodiac Pool Systems, Inc. 2620 Commerce Way Vista, CA 92081-8488 800.822.7933 www.nature2.com

© 2010 Zodiac Pool Systems, Inc.

{insert part number}

ACCEPTED with COMMENTS UPA Letter Dated:

Inder the Federal Insecticide, in application and Rodenticide Act as intended, for the pesticide, registered under EPA Reg. No. 677/2-5

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#### **Efficacy Claims**

[4, 6 month] algae [control, treatment, preventative].

[4, 6] month Nature<sup>2</sup> cartridge meets [the] EPA [pool] efficacy requirements.

Algae control for [4, 6] months [for the life of the cartridge]

Algae treatment system

[Around, Round, 24/7] the clock algae [fighter, fighting]

Under the Federal Insecticide, Pingroide, and Rodenticide Act as amended for the pesticide,

[Around, Round, 24/7] the clock [disinfection, disinfecting, sanitation, sanitization] [Around, Round, 24/7] the clock [disinfection, disinfecting, sanitation, sanitization] [Around, Round, 24/7] the clock [disinfection, disinfecting, sanitation, sanitization] [Around, Round, 24/7] the clock [disinfection, disinfecting, sanitation, sanitization] [Around, Round, 24/7] the clock [disinfection, disinfecting, sanitation, sanitization] [Around, Round, 24/7] the clock [disinfection, disinfecting, sanitation, sanitization] [Around, Round, 24/7] the clock [disinfection, disinfecting, sanitation, sanitization] [Around, Round, 24/7] the clock [disinfection, disinfecting, sanitation, sanitization] [Around, Round, 24/7] the clock [disinfection, disinfecting, sanitation, sanitization] [Around, Round, 24/7] the clock [disinfection, disinfecting, sanitation, sanitation] [Around, Round, Round,

[Around, Round] the clock algae [treatment, control, preventative] [for your swimming pool]

[Constant, Consistent, Continual, 24/7] algae [control, treatment] [for your swimming pool]

[Disinfects, Sanitizes, Works] [around, round, 24/7] [the clock]

Defend against algae [with] [the] [Nature<sup>2</sup>] [system\*]

Destroys bacteria and algae growth with CRT

[Hassle, Trouble] free algae control

[Effectively] [Fights, combats, defends against, inhibits, suppresses, resists, controls] algae [for [4, 6] months]

Keeps algae in check [for [4, 6] months]

In combination with lower chlorine levels, [Nature<sup>2</sup> technology<sup>†</sup>, {insert product name}] is proven to [effectively] control[s] [typical, common] swimming pool algae

Keep algae [at bay, under control] for [4, 6] months

Kills [common, typical] [swimming] pool bacteria [quickly, in a hurry]

[Insert product name] meets [the] EPA's [pool] efficacy requirements [for a period of [four, six] months].

[Nature<sup>2</sup> technology<sup>†</sup>, {product name}] and chlorine work together to effectively [inhibit, reduce, suppress, fight, control] bacteria and algae

[Nature technology, *product name*] effectively [reduces, inhibits, suppresses, controls] bacteria and algae

[Nature<sup>2</sup> technology<sup>†</sup>, {product name}] [Fights, combats, defends against, inhibits, suppresses, resists] algae growth

[Nature<sup>2</sup>, {product name}] minerals help rid the water of harmful bacteria

[Nature<sup>2</sup>, \( \text{product name} \) [patented] mineral[s] [technology \( \text{t} \)] destroy bacteria with a controlled release formula that lasts [4, 6] months

["Product name" features] Nature<sup>2</sup> technology<sup>†</sup> [which] is an effective process that sanitizes pool water using minerals and just 0.5ppm chlorine.

[Proven] control of [common] [swimming pool] bacteria [and] [algae]

Reduces [common] [swimming pool] bacteria [and] [algae]

Sanitize and inhibit [suppress, control] algae [the Nature2 way!]

[Silver, Nature<sup>2</sup> technology<sup>†</sup>, {insert product name}] [with, and] [chlorine] kills bacteria

[Silver, Nature<sup>2</sup> technology<sup>†</sup>, {insert product name}] is an effective bactericide [and works well with oxidizing agents]

[Silver, Nature<sup>2</sup> technology<sup>†</sup>, finsert product name] kills bacteria and lowers chlorine usage.

The Nature<sup>2</sup> System\* [with CRT] effectively sanitizes your pool.

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1/3

#### Ease of Use

Algaecide [Algae] and bactericide [bacteria] [control] [all] in one [cartridge]

[Automatic], [Automatically] [dispensing of, dispenses] minerals [and chlorine] [automatically] {the chlorine claim for use with models paired with chlorine dispensers/generators}

Automatically dispenses minerals [and chlorine] {the chlorine claim for use with models paired with Zodiac's salt water generator}

Conveniently simple

Effortless algae [management, control]

Eliminate daily dosing

Engineered [for, to last] [4, 6] months [for your size] [in your] [pool]

Engineered to control bacteria and algae for [4, 6] months

Enjoy the water

Enjoy your pool [with less work]

Enjoy your pool again - eliminate the need for daily dosing

Install in seconds [- lasts [six, four] months]

Installation is simple

[It works [to control algae]] so you don't have to

[It] does the work for you

[lt] works while you [sleep, play, swim]

Less time maintaining, more time relaxing!

[Maintenance, management] free algae control.

[Nature<sup>2</sup>, technology<sup>†</sup>, {product name}] minerals require no manual dosing

No more daily maintenance with [replacement] products that last weeks or months at a time

One [easy] step [to] algae [control, management] [in your swimming pool]

[Reclaim, regain] the fun. [Reduce the work.] [Increase your pool's life]

Save time

Simple, Do-It-Yourself Installation

Simple, [effective, efficacious], cost effective

Simply discard at the end of the season

Simply replace the cartridge every [six, four] months

Simply [replace, discard] the cartridge every [six, four] months

Spend less time shocking your pool

Spend more time in your pool, less time adding chlorine

Take back the fun of your pool by reducing the work and increasing the pool's life

Twice as nice - bacteria and algae control in one cartridge

#### Controlled Release Technology

Controlled copper release prevents pool staining

Controls coppers release to prevent pool staining

ACCEPTED
with COMMENTS
EPA Letter Dated

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Page 4 of 26 Controls coppers release to prevent pool staining

Controlled release [of] algaecide

Controlled released algae treatment [technology]

Controlled Release Technology

Controlled Release Technology (CRT) controls the release of silver and copper mineral ions into your pool water.

Controlled release technology - no [copper, or, silver] stains, guaranteed!

[Manage, fight, combat, defend against, inhibit, suppress, resist, control] algae with controlled release technology [CRT]

[Nature<sup>2</sup>, technology<sup>†</sup>, {product name}] controls release to prevent staining

#### **Innovative Technology**

21st century mineral technology

Combined mineral technology

Algae treatment with controlled release technology [CRT]

Alumina [mineral] matrix

[At, On] the leading edge of innovation [[and] technology]

Based on mineral technology {product name may be inserted at beginning}

Bromine compatible

[Complete] [Nature<sup>2</sup>] mineral pool care works in all pools

Contains minerals from nature

Contains [silver, copper] [alumina] [from nature] [!]

Copper [a component of] [Nature<sup>2</sup>, technology<sup>†</sup>, /product name/] effectively [inhibits, suppresses, controls, fights] algae [growth]

[Engineered, Patented] mineral[s] [silver] [copper] [alumina] [technology]

Features Nature<sup>2</sup> Technology<sup>†</sup>

In combination with 0.5ppm chlorine, Nature<sup>2</sup> technology<sup>†</sup> [{product name}] is as effective [against common swimming pool algael as chlorine alone

Innovative pool [water] technology

It's Nature<sup>2</sup> Technology<sup>†</sup>

Let [Nature<sup>2</sup>, {product name}] minerals handle the [bulk, majority] of your water sanitation needs

[Manage, fight, combat, defend against, inhibit, suppress, resist, control] algae effortlessly

Mastering the elements

Mineral technology for the 21st century

Minerals + Innovation Unite

- = Algae Control
- = Increased Chlorine Effectiveness
- = Enhanced Water Quality

[Mineral cartridge] Lasts [six, four] months

Minerals, such as silver and copper, have long been known for their sanitizing antimicrobial properties. Nature<sup>2</sup> brings the benefits of these elemental ingredients to create pool water that is noticeably cleaner, clearer, and softer.

Nature<sup>2</sup> copper [-alumina, mineral] granule [technology<sup>†</sup>]

with COMMENTS EPA Letter Dated: 311 2 8 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 67712-5

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Nature<sup>2</sup> - it's elemental

Nature<sup>2</sup> [technology<sup>†</sup>, {product name}] controls release of active ingredients

Nature<sup>2</sup> meets the EPA requirements to lower previously approved chlorine levels by up to 50%\* (\*1.0ppm was EPA's previously approved level for a stabilized swimming pool).

[Nature<sup>2</sup>] [{product name}] [technology<sup>†</sup>, mineral formula] provides silver to destroy bacteria and alumina to help keep the pH in a safe range [without monitoring]

[Providing] innovative technology for over {insert appropriate number} years

Silver destroys bacteria to reduce chlorine use up to 50%\*

\*compared to the minimum EPA approved level of 1.0 for a stabilized swimming pool

[Silver, Nature<sup>2</sup>, {product name}] [minerals] plus 0.5ppm chlorine is as effective as 1.0ppm chlorine

Swim with mineral technology

Swim with [Nature<sup>2</sup>, mineral, {insert product name}] technology<sup>†</sup>

[Sustained, controlled] algaecide release technology

The copper in [Nature<sup>2</sup> technology<sup>†</sup>, {product name}] effectively controls algae

The Mineral Solution, Rediscovered

The Nature<sup>2</sup> System\* is an exclusive patented mineral technology.<sup>†</sup>

<sup>†</sup> Nature<sup>2</sup> technology consists of the minerals silver and copper.

[Zodiac -] [creators of, inventors of, pioneers in] pool mineral technology

[Zodiac -] leading the way in [innovation, innovative technology]

With COMMENTS EPA Letter Dated

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Under the Federal Insecticide, Fungicide, and Redentuade Act as amended, for the pesticide, registered under EPA Reg. No. 6 7712-5

#### **Product Benefits**

Lasts one season (up to [four, six] months)

[Lower chlorine levels] help[s] keep [the] pool pH balanced

Lower chlorine levels help prevent damage to equipment and surfaces

Requires only 0.5ppm chlorine to disinfect pool

Mineral sanitizer for fresh clean pool water.

Nature<sup>2</sup> is an effective pool sanitizing solution. In conjunction with your pool's filtration system, it delivers minerals to provide improved pool water quality. It allows you to use less chlorine, thereby reducing the potential for chlorine irritations and odors. With Nature<sup>2</sup>, your swim experience is clean, fresh, and gently soothing.

Nature<sup>2</sup> [technology<sup>†</sup>] in the presence of low levels of chlorine is proven to effectively control [typical, common] swimming pool algae.

[Nature<sup>2</sup> technology<sup>†</sup>, {product name}] is effective against swimming pool algae.

[Nature<sup>2</sup>, technology<sup>†</sup>] reduces chlorine consumption

[Nature<sup>2</sup>, technology<sup>†</sup>, {product name}] requires no sequestrant

[Nature<sup>2</sup>, {product name}] minerals [also] keeps your pH balanced by acting as a neutralizer

No sequestrant required

Reduces chlorine use to just 0.5ppm

Reduces chlorine use up to 50%

Reduce[s] [your] chlorine use

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Page 6 of 26 {Optional language/pictures/diagrams that may appear on any panel of the carton tabel in any combination}

[Reduces, Inhibits, Suppresses] [typical, common] swimming pool algae [in the presence of [0.5ppm chlorine, low chlorine levels]]

Saves you money

The mineral pool sanitizer

Won't stain.

#### **Swimmer Comfort**

Enhance[d, s] swimmer comfort.

No unpleasant odors

[Nature<sup>2</sup> technology<sup>†</sup>, {product name}] [reduces, lowers] the formation of chloramines and odors

-[Nature<sup>2</sup>, {product name}] minerals reduces faded-swimsuits-associated with chlorine

Reduces [faded swimsuits]

Reduces chlorine odors

Reduces premature damage to pool equipment or surfaces and unpleasant odors associated with chlorine

-No unpleasant odors

Spend the day [in the pool] without worrying about faded swimsuits

[Nature<sup>2</sup>, system, {product name}] gives you a reliable way to have fresh, clean, clear water in your [family's] pool.

#### Water Attributes

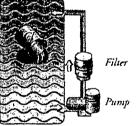
Clarif[y, ies] pool water

Compare the Difference! {photo dependent on model}

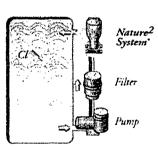
Conventially treated pool

Nature2 System\* treated pool

er Nature<sup>2</sup> VPG Conventionally treated pool



Nature<sup>2</sup> System\* sanitized pool



ACCEPTED
with COMMENTS
EPA Letter Dated:

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For Crystal Clear Water in All Types of Pools

[For] Water that [looks] [and] [feels] luxurious

Guaranteed - no stains!

Improves water quality by

Destroying bacteria for improved clarity

Helping to maintain a neutral pH for softer water

Makes water brilliantly clear [and] [soft]

[Nature<sup>2</sup>, {product name}] minerals condition the water for extra softness

[Nature<sup>2</sup>, {product name}] minerals make a difference you can see and feel

[Nature<sup>2</sup>, technology<sup>†</sup>, {product name}] controls release to ensure algae control while preventing copper staining

[Nature<sup>2</sup>, technology<sup>†</sup>, {product name}] provides [continuous] algae control [from day [1, one]]

[Nature<sup>2</sup>, technology<sup>†</sup>, {product name}] [manages, fights, combats, defends against, inhibits, suppresses, resists, controls] [pool] copper levels [for stain-free algae control]

[Nature<sup>2</sup>, technology<sup>†</sup>, [product name]] reduces coppers spikes from algaecide products to reduce staining

[Nature<sup>2</sup>, technology<sup>†</sup>, {product name}] [regulates, controls] [the copper in] your swimming pool [copper levels] [providing you with] a no stain guarantee

[Nature<sup>2</sup>, technology<sup>†</sup>, {product name}] releases copper for [immediate], hassle free algae control

Nature<sup>2</sup> water is brilliantly clear and soft



The Nature<sup>2</sup> System\* with CRT improves water quality.

Restore[s] water clarity

No stain guarantee

No stains, guaranteed

The perfect combination for clear pool water

Water feels softer with a crystal clear shine

ACCEPTED
with COMMENTS
EPA Letter Dated:

JUL 2 8 2010

Under the Federal Insecticide.
Fingicide, and Rodenticide Act as smended, for the posturide, registered under EPA Reg. No. 6 7712-5

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#### **General Claims**

Assembled in USA from components made in USA, China and Australia

For aboveground pools [5,000 to 17,000] [5,000 - 30,000] gallons

It's compatible. Compatible with most pool maintenance products.\*\*\*\*

\*\*\*\* Do not use [this product, Nature<sup>2</sup>] with copper-based algaecides, or Biguanides (Baquacil®, SoftSwim®, Revacil®). Baquacil is a registered trademark of {insert company name}. SoftSwim is a registered trademark of {insert company name}. Revacil is a registered trademark of {insert company name}.

Made in [the] USA {A picture of the US flag may also appear}

Replacement cartridge for [product name] + [product system]

Satisfaction guaranteed.

[Six, four] month guarantee.

The Nature<sup>2</sup> logo is a registered trademark owned by Zodiac Pool Care, Inc.

This product is covered by one or more of the following U.S. Patents: 4,608,247 4,935,116 5,352,369 372,069

To keep your patented Nature<sup>2</sup> Sanitizer operating properly, it is necessary to change [this, the] cartridge every [six, four] months.

Will not damage your pool equipment

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with COMMENTS
EPA Letter Dated:

1 - 23 WW

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 67712-5

13/29

For [5,000 - 30,000 Gallon] [5,000 - 17,000 Gallon] Aboveground Pools

{these part numbers may appear on the respective corresponding label} [P/N] [W] [22360] [22365] [20120] [28165] [228166] [20131] [28009]

{the following vessel/housing names may be used to help consumer determine the correct cartridge for their system}

[Nature<sup>2</sup>]

[Fits all Nature<sup>2</sup> [A] Vessels]

[(Except Nature<sup>2</sup> Limited)]

[Nature2, Vision, Claritec, Clear Vision, EcoSpring, Aquatech, Visipure, White River, Fafco, California, Hawaiian]

{optional cartridge/corresponding vessel checkbox}

Cartridge	Corresponding Vessel
G25 10,000 - 25,000 Gallons	Professional G Inground [In-ground] Vessel
G35 25,000 - 35,000 Gallons	Professional G Inground [In-ground] Vessel
G45 35,000 - 45,000 Gallons	Professional G Inground [In-ground] Vessel
M25 5,000 - 25,000 Gallons	Premium M Inground [In-ground] Vessel
A30 5,000 - 30,000 Gallons	A Aboveground Vessel

#### This carton contains:

Nature <sup>2</sup> Fusion Cartridge	Corresponding System
Nature <sup>2</sup> Fusion AG30 Up to 30,000 Gallons	Nature <sup>2</sup> Fusion Aboveground

{The term "cartridge" or "this product" on this master label may be replaced with the product name on the marketing label}

ACCEPTED
with COMMENTS
EPA Letter Dated:

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 67785

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Under the Federal Insecticide,
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The Low Chlorine Alternative"

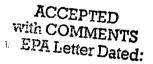






{Graphics below added by amendment on XX/XX/2010}





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Includes everything you need.

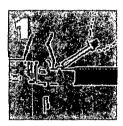
Nature<sup>2</sup> [VPG] Sanitizer, 36" flex-hose, two clamps, installation manual and owner's manual. The only tools you need for installation are a screwdriver and a handsaw.

Fits these pools.

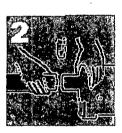
Round Pools from 2' diameter to 20' diameter Oval Pools from 11' x 17' to 16' x 24'

FOR INGROUND [IN-GROUND] AND ABOVEGROUND POOLS WITH CARTRIDGE FILTERS

# Install it yourself in minutes. Lasts [one season] [four months].



Refer to Nature<sup>2</sup> VPG installation manual for further information. Disconnect hose from your filter. (This unit fits either 1 1/4° or 1 1/2° hoses) Use one clamp to attach hose to outlet side of Nature<sup>2</sup> VPG.

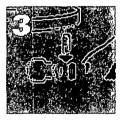


Attach the enclosed hose to the inlet side of Nature<sup>2</sup> VPG using the second clamp.

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Attach the remaining hose end to the outlet of your filter. Then follow the start-up procedures included in the Nature<sup>2</sup> VPG Owner's Manual.

#### PRODUCT SPECIFICATIONS

Capacity

For 5,000 to 17,000 gallon pools

Flow Rates

20-50 GPM, MAX

Pressure Drop

2.5 PSI (5.7 FT-HD) @50GPM 1 1/2" or 1 1/4" smooth hose

Ports Life

One season (up to [4, 6] months)

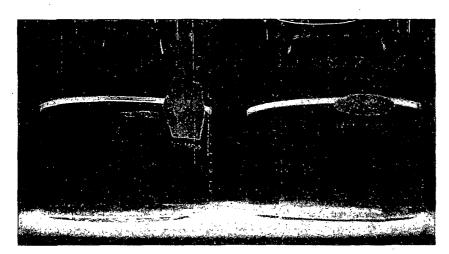
Run Times

6 hours a day minimum

{Insert product name} LASTS ONE SEASON (UP TO [SIX, FOUR] MONTHS) Discard {Insert product name} at the end of the season

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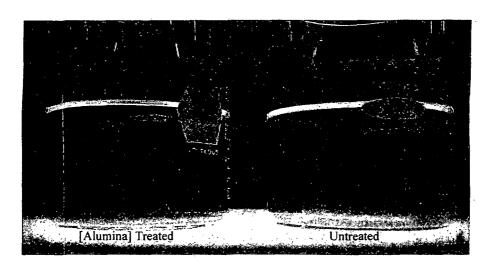




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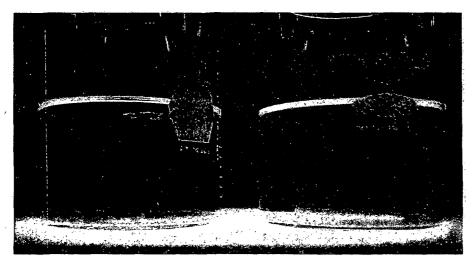
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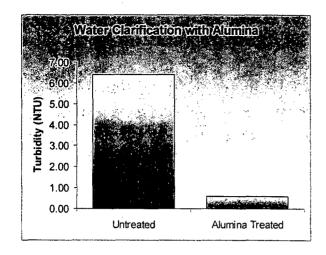
#### [Clarified] with Alumina

Without Alumina

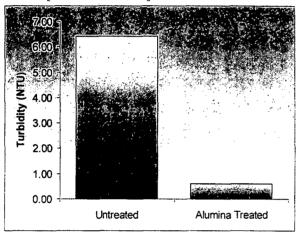


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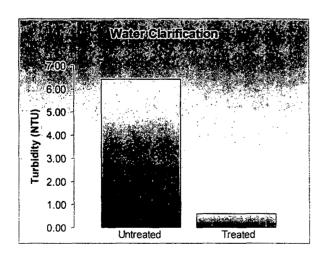
#### [Water clarification]



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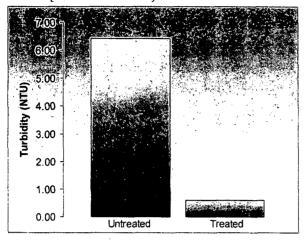
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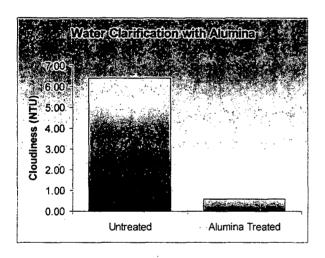
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#### [Water clarification]



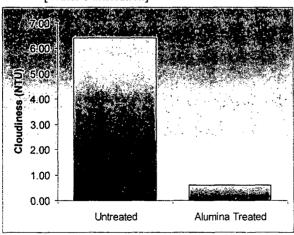


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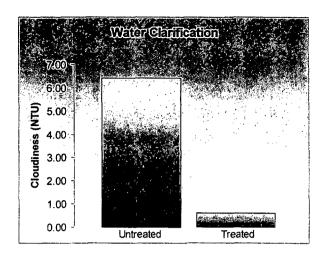
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#### [Water clarification]

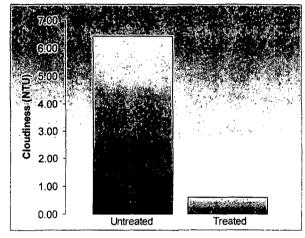


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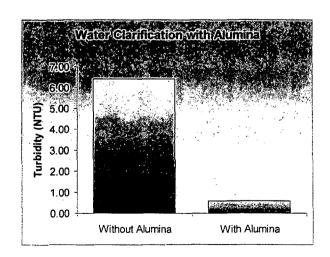
#### [water clarification]



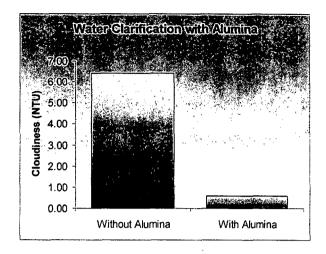
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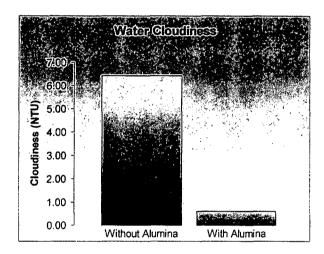
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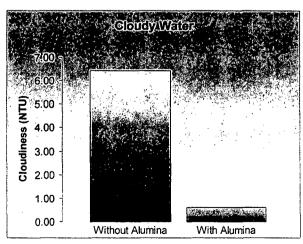
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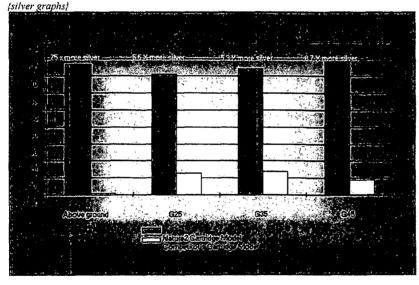
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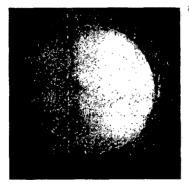
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{copper image, may be used with various claims}



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## Nature<sup>2</sup> AG [Cartridge] rangicide, and Rodenticide amended, for the pesticide, Owner's Manual

registered under EPA Reg. No. 677125 [Replacement Cartridge for Fusion] [Features Nature<sup>2</sup> Technology<sup>†</sup>] {insert product name} with Nature<sup>2</sup> Technology<sup>†</sup>

EPA Reg. No. 67712-5 EPA Est. No. 67712-FL-001 67712-CA-001

#### **IMPORTANT**

Pool Owner, save this manual! Builders, leave this manual with the pool owner!

#### We ask you to take the time to get familiar with this manual.

Thank you for purchasing *(insert product name)* [with] Nature<sup>2</sup> [technology<sup>†</sup>]. We believe the more you know, the more enjoyable your family's swimming experience will be - and the more you will reduce the time, effort and cost of maintaining your pool. Pool owners who switch from conventional chemical programs to the Nature<sup>2</sup> System\* spend less time maintaining their pools. Every pool has its own characteristics of water type, amount of sunlight, etc. The recipe [included in this manual] will help insure good water quality for your pool. Remember, your authorized [Zodiac, Nature<sup>2</sup>] dealer can provide professional advice and service.

#### SAFETY INSTRUCTIONS - Important information. Please read prior to installation

Nature [[insert product name]] [cartridge[s]] [have, has] been designed to sanitize aboveground swimming pools from [5,000-30,000] [5,000 – 17,000] gallons



#### ATTENTION Failure to heed the following can result in permanent injury or drowning

#### **EQUIPMENT UNDER PRESSURE**

Always turn pump off prior to installing or changing Nature<sup>2</sup> cartridge. Your pump/filter system is operated under pressure and the pressure must be released before you begin work. Please see your pump/filter owner's manual for further instructions,

#### PREVENT CHILD DROWNING

Do not let anyone, especially small children, sit, step, lean or climb on any equipment installed as part of your pool's operational system. Locate the components of your operational system at least 3 feet from the pool so children cannot use the equipment to access the pool and be injured or drown.

#### LOW CHLORINE RECIPE

You must strictly follow the low chlorine recipe included in this manual to maintain proper water chemistry and avoid health hazards. Failure to follow these instructions can lead to sickness from bacteria and other noxious organisms.



#### CAUTION

#### **Precautionary Statement** Hazards to Humans and Domestic Animals

CAUTION

In the unlikely event that a cartridge breaks, mineral media should not be ingested by humans or animals as it may cause gastric distress

#### First Aid

IF INGESTED: Call poison control center or doctor immediately for treatment advice.

The Nature<sup>2</sup> [Pool] Sanitizer is designed only for residential swimming pools.

\* The Nature<sup>2</sup> System consists of the patented Nature<sup>2®</sup> technology<sup>†</sup> used in conjunction with a chlorine delivery device or 0.5ppm of an EPA registered chlorine pool product.

<sup>†</sup> Nature<sup>2</sup>TM technology consists of the minerals silver and copper.

Nature<sup>2</sup> is a registered trademark of Zodiac Pool Care, Inc.



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Contents	Page	{the correct page numbers will be inserted for each manual}
Safety Instructions	1	
Start Up	2	
[Assembly]	3	
Balance the Water	3	
Install the Cartridge	3	
Recipe	4	
Provide Filtration/Circulation	4	
Troubleshooting	5	
Nature <sup>2</sup> Cartridge Replacement Intervals	6	
Winterizing Your Pool	6	
Disposal	6	
Limited Warranty	7	

#### **Directions for Use:**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

### Nature<sup>2</sup> Compatibility

Nature<sup>2</sup> Systems\* can be used with all types of pool chemical treatments available except [bromine and bromide based chemicals,] biguanide products (Baquacil<sup>1</sup>, Softswim<sup>2</sup> or Revacil<sup>3</sup>) and copper based algaecides. ('A Trademark of {insert company name}, 'A Trademark of {insert company name}, 'A Trademark of {insert company name}.)

Important: When converting [either] a biguanide [or bromine] treated pool to the Nature<sup>2</sup> System\*, the pool must be completely drained and refilled. Then follow the Nature<sup>2</sup> cartridge start-up procedure below.

[Important: Please make sure that the Nature<sup>2</sup> cartridge you have selected corresponds to your swimming pool size based on gallons of water. Using a Nature<sup>2</sup> cartridge for an undersized pool may cause staining of the pool.]

## Start Up

Before starting up a new [Nature<sup>2</sup>] cartridge, clean debris and algae out of the pool and [pool] equipment.

Important: Do not install the new cartridge until the pool water is clean and chemically balanced.

Balance pool water before installing [Nature<sup>2</sup>] [sanitizer, cartridge].

pH 7.4-7.8 Calcium Hardness 200-400 ppm Total Alkalinity 80-150 ppm

Consult with your [Nature<sup>2</sup>, Zodiac] dealer for specific water balance instructions.

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### **Balance the Water**

To find out if your pool water is balanced:

· take a water sample to your dealer to be tested regularly, or

ask your dealer to recommend a pool test kit for water balance.

Element: pH	If it's too	The surface of your pool can become etched	How to fix: Add pH increaser
Range: 7.4-7.8	low:	Metal parts in the pump and plumbing will corrode.  "Scale" forms on the surface of your pool.	How to fix: Add pH decreaser
	high:	The water can become cloudy.  Equipment can become damaged.	now to hx. Add pri decreaser
Element: Calcium	If it's too	Water is less stable.	How to fix: Add calcium
Hardness Range: 200-400 ppm	low:	In plaster pools, the calcium is taken out of the plaster, causing the surface to deteriorate.	hardness increaser.
	If it's too high:	Rough, discolored deposits ("scale") will form on the pool surface and inside pool equipment.	How to fix: Drain or dilute the pool water. Consult your dealer.
Element: Total Alkalinity Range: 80-150 ppm	If it's too low:	It provides no buffer so that you constantly get fluctuating pH readings, which can damage equipment and pool surfaces.	How to fix: Use an alkalinity increaser.
	If it's too high:	White deposits ("scale") form on the tile line. The plaster on pool surface becomes rough or discolored.  The water becomes cloudy or milky white.	How to fix: Add acid to bring alkalinity down.

## Install the [Cartridge, Sanitizer]

1 Install the cartridge [into your pool filter] after water is balanced. [See, Refer to] [the, your] Nature<sup>2</sup> {the model / product name may also be inserted here} [vessel] operating manual for additional instructions [regarding your particular model's installation]. {the product name may be used in place of or in addition to the term "cartridge"}

2 [Superoxidize, Superchlorinate] the pool water with chlorine according to manufacturer's instructions to burn off contaminants [and activate cartridge.]

Important: Initial superoxidation with chlorine is required to burn off contaminants and activate cartridge.

- 3 Run the circulating pump either:
- 24 hours a day for 4 days, maintaining 1-2 ppm [free] chlorine throughout, or
- 6 hours a day for 14 days, maintaining 1-2 ppm [free] chlorine throughout.
- 4 Let chlorine dissipate to 0.5 ppm once start up period is completed.

Do not enter the pool if the free available chlorine residual is over 3 ppm.

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## Recipe

There is one recipe for maintaining clean, clear, sanitized water with minimum time and effort. This recipe provides the easiest and most economical way to care for your Nature<sup>2</sup> pool.

Low-Chlorine Recipe

Once the 4-day or 14-day start-up period is done, allow the free [available] chlorine residual to drop to 0.5 ppm (by reducing the amount of chlorine you add) then:

Ingredients:

Nature<sup>2</sup>cartridge {product name may be inserted} Chlorine granules, tablets, liquid or generator pH and total alkalinity adjusting chemicals Calcium hardness increaser, if needed Water test kit

When:
Every day
Once a week

What to do:
Run pump and filter at least 6 hours every day.
Balance pH and total alkalinity.

Twice a week Check chlorine residual; add chlorine to maintain at

least [a] 0.5ppm [free chlorine] [range using the chart

below].

As needed If water is hazy, superoxidize with chlorine according to manufacturer's instructions. Additional

shocking is recommended following rainstorms or heavy bather load. Do not re-enter the pool if the free available chlorine residual is over 3 ppm.

Add the following amounts of chlorine per 10,000 gallons of water to increase free chlorine by 0.5 ppm

Type of Chlorine Containing Compound	% Active Ingredient	% Available Chlorine Content	Ounce Quantity Required	Gram Quantity Required
Sodium Hypochlorite Liquid	5.25	5.25	12.7	361
Sodium Hypochlorite Liquid	9.2	9.2	7.3	206
Sodium Hypochlorite Liquid	10	10	6.5	184
Sodium Hypochlorite Liquid	12	12	5.6	158
Calcium Hypochlorite	65	64	1.1	30
Dichloroisocyanurate	. 99	62	1.1	30
Lithium Hypochlorite	29	35	1.9	54
Trichloro-s-triazintrione	99	90	0.7	21
Chlorine Gas, from any source including chlorine generators	100	100	0.7	19

## Provide Filtration/Circulation

To manage:

You need to:

Circulation

Follow the manufacturer's directions for keeping the circulating pump in good working order and operate it at

least six hours a day. Consult your [Nature<sup>2</sup>, Zodiac] dealer for optimum run times.

**Filtration** 

Check the pool's filter periodically and clean it as recommended by the control with Control wit

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Troubleshooting Guide [Consult your [Nature2, Zodiac] Dealer for additional assistance or call 1-800-822-7933

	Problem	What to look for Under	theregal Insecticide,
Cloudy water Frequently caused by improper start up. See section on Start Up [and	Poor filtration	Slow filter turnover ratepungio ameno regist	id Bakkarioud dioide Act as id Audulius gestiende, ered under Epareguno. 6
Install the Cartridge.]	Algae growth	Hazy pool water, may have slightly green appearance.	[Superchlorinate, Superoxidize] water with chlorine according to manufacturer's instructions and brush pool walls.
	Unbalanced water	1 High hardness 2 High TDS (total dissolved solids) 3 High pH 4 High total alkalinity	Balance the pool water.
Algae Algae may be caused by insufficient levels of oxidizer and/or inadequate water circulation.	Green algae	Pea green color; attaches to pool walls sometimes colors the entire body of water.	1 Check pH and adjust if necessary. 2 [Superchlorinate, Superoxidize] with chlorine according to manufacturer's instructions and brush pool walls. 3 Repeat steps 1 and 2 until algae is gone.
	Black algae  Mustard algae	Black spots on pool walls.  Yellow or brown film on steps or walls.	1 Brush affected areas. 2 [Superchlorinate, Superoxidize] water with chlorine according to manufacturer's instructions. 3 Add algaecide. 4 Vacuum pool. 5 Repeat steps 1 through 4 until algae is gone.
	Note: Regular algaecide treatment algae problems. Do not use algae		
Stains	Blue/green	Copper or iron from pool equipment corrosion or water supply.	1 Adjust pH and total alkalinity to ideal ranges. 2 Vigorously brush stained areas.
	Red/brown	Iron or manganese from equipment corrosion or water supply.	3 Add sequestrant. 4 Run filter. 5 Twelve hours later, [superchlorinate, superoxidize]
	Black	Manganese in water supply.	pool. 6 Test and balance water. 7 Test pool water for dissolved metals.
	Metal tarnishing	High native mineral content in water; unbalanced water.	Clean with soft cloth and mild detergent. Test water for minerals; use a sequestrant; maintain water balance.
Scale	Crusty deposits on pool surfaces.	High pH and high total alkalinity	Adjust pH and total alkalinity to ideal ranges.
		High TDS (total dissolved solids) or high hardness levels.	Replace a volume of pool water with water low in hardness and dissolved solids.     Use sequestrant to prevent scale buildup if high hardness levels are a continuing problem.

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## Nature<sup>2</sup> [Cartridge, Sanitizer] Replacement Intervals

A cartridge lasts [six, 6, four, 4] months or one season, whichever is shorter. The cartridge should not be used longer than [six, 6, four, 4] continuous months.

Always turn pump off prior to installing or changing Nature<sup>2</sup> {product name may be inserted} [cartridge]. Your pump/filter is operated under pressure and the pressure must be released before you begin work. Please see your pump/filter owner's manual for further instructions.

## **Winterizing Your Pool**

Use these steps as a guide. Consult your dealer for specific information [in, on] your area.

#### Warm Climate

- 1 Reduce the number of hours the pump runs since the cooler weather decreases the spread of algae and other pollutants.
- 2 There is no need to [superoxidize, superchlorinate] the pool during cool weather unless the water becomes cloudy (as may occur after a winter storm). See Cloudy Water in Troubleshooting section.

#### **Cold Climate**

- 1 Check total alkalinity and pH of pool to make sure that they are in proper balance.
- 2 Vacuum the pool bottom to remove any debris or other potential contaminants.
- 3 [Superoxidize, Superchlorinate] the pool with chlorine according to manufacturer's instructions to clear the water.
- 4 Add a winter algaecide following manufacturer's instructions.

Important: Do not use a winter algaecide with copper in it. [This will void the Nature<sup>2</sup> no-stain warranty.]

- 5 Backwash the filter.
- 6 Drain part of the pool water. The amount to drain varies from one part of the country to another. Consult your dealer for advice.
- Remove the [Nature<sup>2</sup>, sanitizer system] cartridge and discard with household trash.
- 8 Winterize the pipes with pool antifreeze following manufacturer's instructions.
- 9 Drain the water out of all equipment (pump, filter, etc.)
- 10 Store all baskets, hoses and cleaning equipment, indoors if possible.
- 11 Cover the pool with a winter cover.

## **Disposal**

After [six, four] [months] [one season] of use, discard [Nature<sup>2</sup>, {product name may be inserted}] cartridge in household trash. Do not save the [cartridge, it] for re-use. The [cartridge, {product name may be inserted}] is manufactured with the mineral media sealed inside. In the unlikely event [a cartridge, {product name may be inserted}] breaks, remove it and vacuum out any media introduced into the pool.

ACCEPTED
with COMMENTS
EPA Letter Dated:

JUL 28 2010

Under the Federal Insecticide, Functional and Rodenticide Act as amended for the pesticide. registered under EPA Reg. No. 677/2-5

Note: Bracketed [] information is optional text/picture/diagram. Text separated by a comma (,) denotes and/or options. {Bracket Text} is for administrative purposes. Punctuation, text size, text font, text color, capital letters, lower case letters, italics, bold and underline may vary on final printed labels. Spelling may vary when alternate spelling is acceptable; for example "algaecide" or "algicide"

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{This warranty statement is optional}

## Limited Warranty

#### Nature<sup>2®</sup> Limited Warranty

The limited warranties contained within this document are the only warranties given with your [Nature<sup>2</sup>, {insert model name] [Sanitizer, Cartridge] and supercede any prior warranties. All other warranties, expressed or implied, including the implied warranty of merchantability or the implied warranty of fitness for a particular purpose are hereby disclaimed. Our sole obligation under this warranty, and the purchaser's sole remedy, is limited to repair or replacement of the [Nature<sup>2</sup>, {insert product name}] [Sanitizer, cartridge], [or one of its parts]. The Nature<sup>2®</sup> warranty applies to the original owner only.

#### THE LIMITED WARRANTIES OF THE [NATURE<sup>2®</sup>, {insert product name}] [cartridge, SANITIZER[s]] [ARE]]:

[The] [Nature<sup>2</sup>, (insert product name)] [Sanitizer, cartridge[s]] [are, is] warranted to be free of defects in materials and to perform satisfactorily for a period of [six, four] months from the date of purchase. [Nature<sup>2</sup>, finsert product name]] [cartridge[s], Sanitizer] [is] warranted not to cause copper staining in your pool. This limited warranty requires that you exercise reasonable care of your pool and keep water in balance at all times and not use a copper-based algaecide. This [limited] warranty does not cover discoloration to chromium fittings. This warranty does not cover [cartridge[s], sanitizers] used with any biguanide products such as Baquacil® or Soft Swim® [or any products containing Bromine or Bromine-based chemicals]. If the [cartridge, sanitizer] is defective and does not perform satisfactorily for the entire [six, four] months, we will [make a prorata rebate based on your actual period of use. You are responsible to pay the below-indicated percentage on the then applicable retail cost: <1 month-0%; 1-2 months-25%; 3-4 months-50%; 5-<6 months-75%. [replace your [finsert product name]] [cartridge, sanitizer.]

#### **EXCLUSIONS FROM WARRANTY**

[The] [Nature<sup>2</sup>, {insert product name}] [cartridge[s], Sanitizer] [are, is] designed for use on aboveground pools from [5,000 to 30,000] [5,000 to 17,000] gallons [only]. If it is used in any other application, the warranty is void, and the purchaser and/or pool owner releases the manufacturer from [any and] all claims related to the use of the Nature<sup>2</sup> [Sanitizer, Cartridge].

This warranty does not cover problems arising in whole or in part from purchaser's negligence, misuse or abuse, improper maintenance or storage, accident, improper installation, improper application, failure to follow all appropriate safety precautions, Acts of God, abnormal weather conditions, damage from plants or animals, and improper use of chemicals.

This warranty specifically excludes all incidental or consequential damages, except where state law requires them to be paid. This warranty gives you specific rights. You may have other rights that vary from state to state.

#### TO SUBMIT A CLAIM

Report claims to Zodiac Pool Systems, Inc. by calling 1-800-822-7933. Only the original purchaser may submit a claim under this limited warranty. [All] Claims must be accompanied by an original purchase receipt.



ZODIAC POOL SYSTEMS, INC. 2620 Commerce Way Vista, CA 92081 Tel: 800-822-7933 Fax: 877-327-1403

with COMMENTS EPA Letter Dated:

JUL 2 8 2010

www.zodiacpoolsystems.com

Nature<sup>2</sup> is a registered trademark [owned by, of] Zodiac Pool Systems, Inc. Under the Federal Insecticide, Pungicide, and Rodenticide Act as Printed in the USA amended, for the pesticide, registered under EPA Reg. No. 677/2-5

© Copyright 2010 Zodiac Pool Systems, Inc. [optional manual part numbers] [W17680] [W17525]

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