

PLEASE NOTE

This image contains more than one label approved for this product on this date.

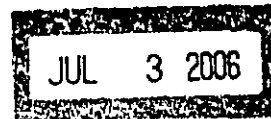
67712-15

07/03/2006

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Sally Hayes
Agent for,
Zodiac Pool Care, Inc.
2028 N.W. 25th Avenue
Pompano Beach, FL 33069

Mail to: Attn: Sally Hayes
SRC
P. O. Box 1014
Columbia City, IN 46725

Subject: Nature² Spa
EPA Registration Number 67712-15
Your Notification Dated June 1st, 2006
EPA Received Date June 5th, 2006

The notification submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, (FIFRA), as amended, to revise the product labeling, is acceptable.

The notification has been made part of the file.

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

Sincerely,

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

Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobials Division(7510C)

NOTIFICATION
Nature² Spa
EPA Reg. No. 67712-15

New claims:

[The] *{insert product name}* [mineral sanitizer] is covered by the following U.S. patents; *{insert patent numbers}*
{Note to reviewer – these patent numbers may include, but are not limited to, 5,352,369; 5,772,896;
5,935,609; D385946; 5,779,913; 6,019,893; 6,165,358}

Don't forget your Nature² Spa Test Strips *{graphic of bottle may be included, other trade names for spa strips may be substituted for Nature² Spa}*

Part of the *{insert trade/product/company name}* water care system.

For use with *{insert trade/product name}* spas

For hot tubs/spas

Use *{insert product name}* to: *{following with claim(s)}*

Nature² Spa Test Strips *{table of contents in owner's manual}*

Just dip and swirl the Test Strip.

See accurate and reliable results on the levels of MPS*, Alkalinity and pH in your spa's water.

Now available at your local *{insert dealer information}* Dealer.

*potassium peroxymonosulfate

Consult your *{insert dealer information}* Dealer for additional assistance or call 1-xxx-xxx-xxx.

Clarifications:

Any numbers on the label can be represented as a numeral or spelled and decimals or fractions can be used where appropriate.

Anywhere it says "pool" the term "spa" may be used

Combining claims

Install in seconds right into your filter Lasts [up to] [a full] [4] [6] months!	Install[s] in seconds right into your [spa] filter {and} lasts [up to] [a full] [4] [6] months
Inhibits the growth of [undesirable] bacteria Brilliantly clear, odor-free spa [hot tub] water	Inhibits the growth of [undesirable] bacteria for brilliantly clear, odor-free spa [hot tub] water

Modify existing claims as follows:

Accepted claim/label language	Modified claim/label language
<p>PRECAUTIONARY STATEMENT Hazards to Humans and Domestic Animals</p>	<p>PRECAUTIONARY STATEMENT Hazards to Humans and Domestic Animals CAUTION</p>
<p>If Ingested: Call Poison Control Center or doctor immediately</p>	<p>If Ingested: Call [a] [the] Poison Control Center or [a] doctor immediately</p>
<p>Installs in seconds right into your filter</p>	<p>Installs in seconds [right into your filter]</p>
<p>The {insert product name}[sanitizer] has been designed to work exclusively in {insert names} spas by utilizing water flow through the {insert company/product name} filter system</p>	<p>[The] {insert product name} [mineral spa] [sanitizer] has been designed to work exclusively in {insert spa description and/or name} by utilizing water flow[ing] through the {insert description/name/company or product name}[filter] [water management] system</p>
<p>Custom designed for {insert company name}</p>	<p>Custom designed for [your] {insert company (full or abbreviated) or spa name} [filter]</p>
<p>Inhibits the growth of [undesirable] bacteria</p>	<p>Inhibit[s] the growth of [undesirable] bacteria</p>
<p>[The Nature² Spa] improves water quality</p>	<p>[The Nature² Spa] improve[s] water quality</p>
<p>Installs in seconds right into your filter</p>	<p>Install[s] in seconds right into your {spa} filter</p>
<p>For use in portable residential spas [hot tubs] only</p>	<p>For use in portable [residential] spas [hot tubs] only</p>
<p>Compatible with ozone</p>	<p>Compatible with [all {insert trade /spa /company name} spa models and the {insert trade /spa /company name}] ozone [system]</p>
<p>The product installs easily and requires no electricity to run. You don't touch it again except to replace the cartridge every [4] [6] months.</p>	<p>The [This] product installs easily and requires no electricity to run. You don't touch it again except to replace the cartridge every [4] [6] months.[!]</p>
<p>The {insert product name} has been designed to work exclusively in {insert names} spas by utilizing water flow through the {insert company/product name} filter system</p>	<p>[The] {insert product name} has been designed to work exclusively in {insert product /trade / company names} spas by utilizing water flow[ing] through the {insert company /trade /product name} [filter] system</p>
<p>Installs in seconds right into your filter gate Brominator™</p>	<p>Installs in seconds right into your filter gate sanitizer chamber</p>
<p>Specifically designed for {insert company name}</p>	<p>{insert product name} is] Specifically [Exclusively] designed for [to work in your] [to use with] {insert company name /trade /product name}</p>
<p>Do not use this product with copper-based algaecides, bromine or bromide chemicals, or Biguanides (Baquacil®, BaquaSpa®, SoftSwim®, Revacil®). Baquacil and BaquaSpa are registered trademarks of Avecia. SoftSwim is a registered trademark of Biolab, Inc. Revacil is a registered trademark of Mareva Inc.</p>	<p>Do not use this product with copper[-based] algaecides [algicides], bromine or bromide [based] chemicals, or Biguanides (Baquacil®, [BaquaSpa®], SoftSwim®, Revacil®). Baquacil and BaquaSpa are [Baquacil® is a] registered trademark[s] of Avecia. SoftSwim is a registered trademark of Biolab, Inc. Revacil is a registered trademark of Mareva Inc.</p>
<p>Please refer to the operating manual for complete installation instructions.</p>	<p>Please refer to the [spa's] operating manual for complete installation instructions.</p>

Brilliantly clear, odor-free spa [hot tub] water	Brilliantly clear[,] [and] odor[-] free spa [hot tub] water
It's easy to install!	It's easy [to install!]
Mineral Sanitizers for Spas	Mineral Sanitizer for Spas [/Hot Tubs]
Designed to fit most portable spas	Designed to fit most portable spas [/hot tubs]
Nature ² Spa features Nature ² Technology which is an effective process that sanitizes spa water using minerals	Nature ² Spa features Nature ² technology[,] [which] is an effective process that sanitizes spa water using minerals
The recipe will help insure good water quality for your spa.	The recipe [included in this manual] will help insure good water quality for your spa.
Use sequestrant [per installation instructions] to prevent scale buildup if high hardness levels are a continuing problem.	Use sequestrant [per installation instructions] to prevent scale buildup if high hardness [levels are] is a continuing problem.
Superchlorinate water with an EPA registered source of dichlor* according to manufacturer's instructions. *sodium dichloroisocyanurate	Superchlorinate water with [an] EPA registered source of dichlor* according to manufacturer's instructions. *sodium dichloroisocyanurate
Turn jets off, retest and repeat procedure until the TA reads close to 100ppm.	Turn jets off, retest and repeat procedure until the TA reads close to 80 ppm. <i>{change made to be consistent with established specifications}</i>
Remember that hot water can carry many forms of bacteria, but the combination of {insert product name} plus an oxidizer, like Chlorine and Bromine, is not a guarantee for "bacteria-free" water.	Remember that hot water can carry many forms of bacteria, but the combination of {insert product name} plus an oxidizer, like Chlorine or MPS*, is not a guarantee for "bacteria-free" water. *potassium peroxymonosulfate
If the cartridge is defective and does not perform satisfactorily for the entire four [six] months, we will make a prorated 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%; >2-3 months-50%; >3-4 months-75%	If the cartridge is defective and does not perform satisfactorily for the entire four [six] months, we will replace the cartridge.

NEXT

LABEL

67712-15

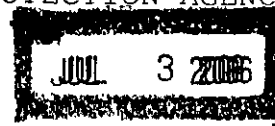
07/03/2006

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P. O. Box 1014
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Subject: Nature² Spa
EPA Registration Number 67712-15
Your Notification Dated June 1st, 2006
EPA Received Date June 5th, 2006

The notification submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, (FIFRA), as amended, to revise the labeling by adding additional installation instructions, is acceptable.

The notification has been made part of the file.

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

Sincerely,

A handwritten signature in cursive script that reads "M Swindell".

Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobials Division(7510C)

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NOTIFICATION – Installation Instructions
Nature² Spa
EPA Reg. No. 67712-15

Attached are installation instructions for various models of cartridges. In addition, associated manual changes are noted below.

Page 4 – add “Refer to Assembly and Installation Diagrams below for instruction regarding your particular model’s installation.”

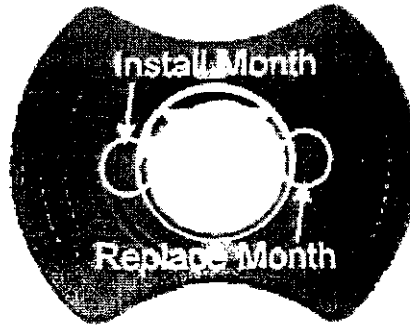


Figure A – Replacement Reminder Date Ring
 Before you install the {insert product name} cartridge, be sure to rotate the Date Dial until the current month is displayed in the “installed” window. The date when this {insert product name} cartridge should be replaced will automatically appear in the “Replace” window.

{insert product name} Installation Procedures:

Step 1: Wait 48 hours after adding Sequestrant before installing {insert product name} cartridge. Rinse the {insert product name} to remove any loose dust or fragments that may have been created as a result of shipping.

Step 2: If your spa is:

a. **2000 to current your model spas with the {insert trade name} Water Management System manufactured in 2000 and after:**

1. While standing above the filter area, remove the {insert trade name} filter compartment lid.
2. Remove 8" skimmer cover on the right.
3. Adjust the Replacement Reminder Date Ring on top of the {insert product name} cartridge. See Figure A for details.
4. Place the {insert product name} cartridge on top of the {insert trade name} filter, then replace the 8" filter flange and filter compartment lid.

b. **1996-1999 model spas with {insert trade name} Water Management System:**

1. While standing above the filter area, remove the {insert trade name} filter compartment lid.
2. Remove 5" filter flange (cross pattern cover).
3. Adjust the Replacement Reminder Date Ring on top of the {insert product name} cartridge. See Figure A for details.
4. Place the {insert product name} cartridge on top of the {insert trade name} filter, then replace the 5" filter flange and filter compartment lid.

c. **1998 to current year model spas with the {insert trade name} or 1992 to current year model spas with the {insert trade name} Water Management System:**

1. Remove the filter compartment lid.

2. Remove 8" skimmer basket.
 3. Adjust the Replacement Reminder Date Ring on top of the *{insert product name}* cartridge. See *Figure A* for details.
 4. Place *{insert product name}* cartridge on top of the 75 sq. ft. filter, then replace the 8" Skimmer Assembly and filter compartment lid.
- d. 1989 to 1996 model spas with the *{insert trade name}* Water Management System:**
1. Remove the *{insert trade name}* canister lid by unscrewing it in a counter-clockwise direction.
 2. Remove the threaded filter retaining nut, or threaded basket/lid assembly at the top of the filter cartridge. While holding down the filter, screw threaded side of the *{insert product name}* cartridge onto the top of the filter stand pipe. The *{insert product name}* cartridge will now hold the filter in place – *do not over-tighten*.
 3. Adjust the Replacement Reminder Date Ring on top of the *{insert product name}* cartridge. See *Figure A* for details.
 4. Reinstall the *{insert trade name}* canister lid by screwing it in a clock-wise direction – *do not over-tighten*.

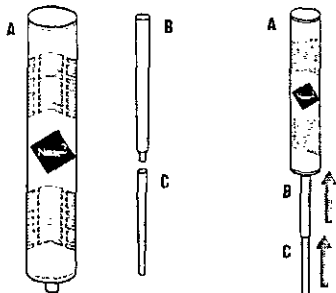
[ASSEMBLY AND INSTALLATION DIAGRAMS]

The {insert product name}[sanitizer] comes in three parts.

The main body [(A)] and two support stems [(B,C)].

- 1 Connect the support stems [together and press onto main body to crate a single device as shown].

[Note: the {insert product name} is designed to fit most portable spas. {insert company name} assumes no liabilities for the product if installed in any way other than the methods described in this manual.]



- 2 Slide the entire device into the core of your [existing spa] filter cartridge. [See examples below].

[Open Top]

[Simply slide unit in from the top. Position near the top half of the cartridge. (Support stems may be cut to position the cartridge correctly.)]

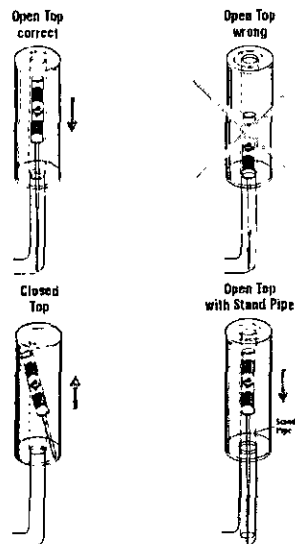
[Open Top with Stand Pipe]

[Some spa filter systems are configured with a standpipe running the length of the filter core. Simply slide unit in from the top. Position near the top half of the cartridge for easy retrieval.]

[Closed Top]

[Simply slide unit in from the bottom. Position unit to rest on shelf inside filter core.]

[Note: When installed, the {insert product name} must be at least 1" (2.5cm) above the bottom of the filter to prevent blocking water flow.]



[graphics may differ]

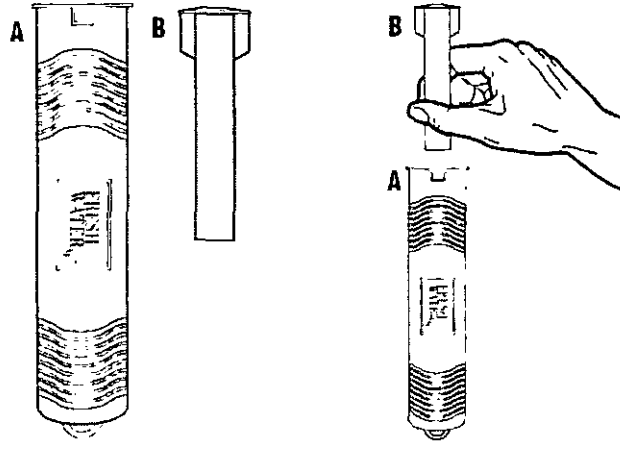
ASSEMBLY AND INSTALLATION DIAGRAMS

The {insert product name}[sanitizer] comes in two parts.

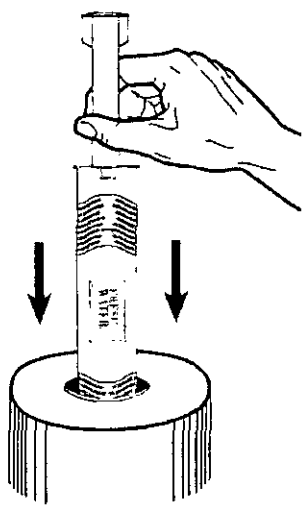
The main body [(A)] and the handle [(B)].

- 1 Attached the handle to [the] main body [to create a single device as shown].

[Note: the {insert product name} is designed to fit most portable spas. {insert company name} assumes no liabilities for the product if installed in any way other than the methods described in this manual.]



- 2 Remove gray cap from filter standpipe.
- 3 Drop sanitizer into filter standpipe, handle up [as shown].



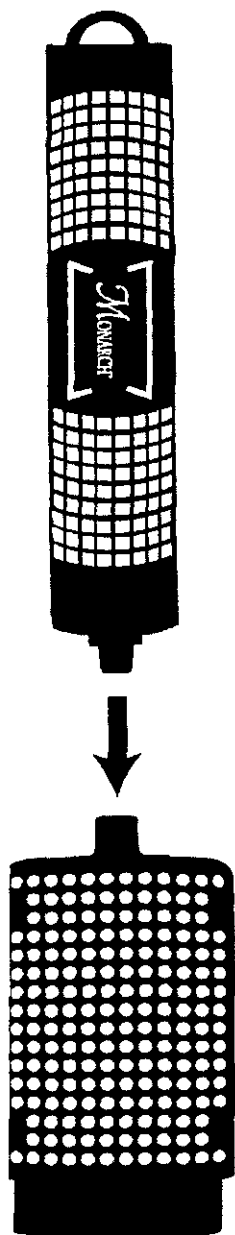
- 4 Replace [gray] cap onto filter standpipe.

{graphics may differ}

[ASSEMBLY AND INSTALLATION DIAGRAMS]

- 1 Remove filter from spa.
- 2 Insert *(insert trade name)* into the standpipe [as shown in Figure 1].
- 3 Replace filter.

[Note: The *(insert product name)* is designed to fit most portable spas. *(insert company name)* assumes no liabilities for the product if installed in any way other than the methods described in this manual.]



[Figure 1]

[Installation:]

[Before opening your filter, please refer to the spa owner's manual for complete installation instructions.]

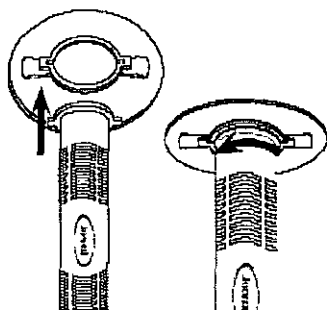
[Step 1]

Twist and remove filter cap.

[Step 2]

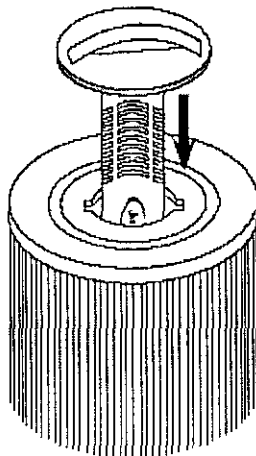
Match up tabs on *{insert product name}* [sanitizer] with tabs on *{insert spa name}* filter lid.

Twist sanitizer gently until it locks securely on the lid.



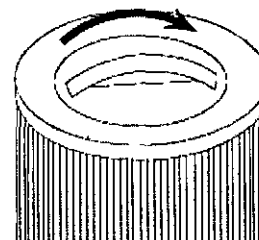
[Step 3]

Slide the entire device into the core of your *{insert spa/product name}* filter cartridge.



[Step 4]

Lock cap into place.

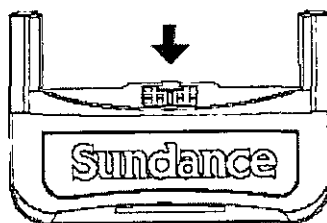


Attention

Before opening your filter, please refer to the spa owner's manual for complete installation instructions.

Installation

Install the *{insert product name}* cartridge into your spa filter gate's sanitizer chamber as shown.



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Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95



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 67712-15	2. EPA Product Manager M. Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Nature2 Spa	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.)

Per PR Notice 98-10 this notification is to add non-pesticidal claims and to clarify and/or modify other accepted claims.

THIS ACTION IS NOT SUBJECT TO PRIA FEES

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.

Section - III

1. Material This Product Will Be Packaged In:					2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* 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 checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container Cartridge for up to 500 gallon spa		5. Location of Label Directions <input checked="" type="checkbox"/> on outer container or insert		
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input checked="" type="checkbox"/> Other On retail box and package insert		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Sally Hayes	Title Agent for Zodiac Pool Care, Inc.	Telephone No. (Include Area Code) 260-244-6270
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent for Zodiac Pool Care, Inc.	
4. Typed Name Sally Hayes	5. Date 06/01/06	

10/10

SRC
Scientific & Regulatory
Consultants, Inc.

June 1, 2006

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

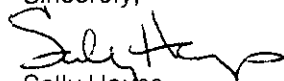
SUBJECT: Nature² Spa
EPA Reg. No. 67712-15

Dear Marshall,

On behalf of Zodiac Pool Care, Inc. (Zodiac), enclosed is a notification to modify the label for Nature² Spa. Attached are installation instructions for various cartridge models. These instructions will appear in each respective basic registrant or supplemental owner's manual. In addition some carton manuals may also carry installation instructions.

Contact me at (260) 244-6270 or at shayes@srconsultants.com if you need clarification or have any questions about this notification.

Sincerely,



Sally Hayes
Agent for Zodiac Pool Care, Inc.

cc: R. Coffey