



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

JUL 28 2008

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Mr. David Swain  
Scientific and Regulatory Consultants, Inc.  
Regulatory Agent for,  
Zodiac Pool Care, Inc.  
2028 N.W. Beach Pool, Florida 33069

Mail to: Attn: David Swain  
SRC Scientific and Regulatory Consultants, Inc.  
P. O. Box 1014  
Columbia City, IN 46725

Subject: Nature Spa  
EPA Registration Number 67712-15  
Your Amendment Dated April 28<sup>th</sup>, 2008  
EPA Received Date April 29<sup>th</sup>, 2008

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, FIFRA, as amended, to expand existing labeling claims is acceptable provided you make the following labeling revisions:

As per our letter dated July 5<sup>th</sup>, 2007, based on the efficacy review of the product labeling, the following revisions must be made to the proposed labeling:

Under the "Efficacy Claims" section, make the following labeling revisions to read as follows:

1. Delete the claims, Around, Round, 24/7 the clock disinfection, disinfecting, sanitation, sanitization, from the product labeling. The claim implies that the product has continuous efficacious properties. This is considered false and misleading.
2. Delete the claim, "kills common, typical spa bacteria quickly, in a hurry. This claim implies that the product is efficacious immediately. This claim is considered misleading and false.

- 3. Delete the claim, Nature<sup>2</sup> minerals help rid the water of harmful bacteria. The active ingredient for this product is metallic silver. The product does not rely on minerals to impart its efficacious properties. This claim is considered misleading and false. The “harmful bacteria” is not identified in the labeling claim.
- 4. Delete the claim, Silver, Nature<sup>2</sup> technology with, and chlorine kills bacteria, from the product labeling. The label does not identify the type of bacteria.
- 5. Delete the claim, Silver, Nature<sup>2</sup> technology, kills bacteria and lowers chlorine usage from the product labeling. The product labeling does not identify the type of bacteria. No data was provided that proves that the usage of the product lowers the use of chlorine. This claim is considered as false and misleading.

Under the “Ease of Use section, make the following labeling revisions to read as follows:

- 6. Delete the claim, “Engineered for, to last 4,6 months for your size in your spa”, from the product labeling. This claim implies that the product is efficacious for the duration of 4, 6 months for various sizes of spas. No efficacy data was provided to support this labeling claim. Therefore, this labeling claim is considered false and misleading.
- 7. Delete the claim, “Enjoy your spa with less work”, from the product labeling. This claim implies that the product imparts such great efficacious properties than any other product that no other action needs to be taken.
- 9. Delete the claim, “It does the work for you”, from the product labeling. This claim implies that the product has greater efficacious properties than any other similar product on the market. This is considered false and misleading.
- 10. Delete the claim, “Reclaim, regain the fun. Reduce the work. Increase your spa’s life”, from the product labeling. This claim implies that the product increases the lifespan of the actual spa. This is false and misleading.
- 11. Delete the claim, “Simple, effective, efficacious, cost effective, from the product label. This claim implies that the use of this product will save you money compared to any other similar product on the market. This is false and misleading.
- 12. Delete the claim, “Take back the fun of your spa by reducing the work and increasing the spa’s life. No efficacy data was submitted to support this labeling claim. This is considered false and misleading.

Under the, Innovative Technology section, make the labeling revisions as follows:

13. Remove the following claims from the labeling:

- “Bathe in naturally with mineral technology ”
- “Bathe in naturally with Nature’, mineral technology”
- “Combined mineral technology”
- “Complete Nature’ mineral spa care works in all spas”
- “Revise “contains” to “utilize” ionic silver”
- “Contains minerals from nature”
- “Contains silver alumina from nature!”
- “Mastering the elements”
- “ Revise “providing innovative technology for over years” to read “providing or having provided.....over years.”
- “When used with MPS, the most recommended oxidant for spas, Nature’ spa delivers crystal clear water quality and an irritant-free spa experience.”
- “Zodiac-creators of, inventors of, pioneers in spa mineral technology”
- “Zodiac-leading the way in innovation, innovative technology”

14. Under the, “Product Benefits” section, make the following labeling revisions:

Delete the labeling claim, “Nature’ minerals also keeps your pH balanced by acting as a neutralizer, from the product labeling. No efficacy data was provided and reviewed to support this labeling claim. This claim is considered false and misleading.

15. Delete the labeling claim, “Saves you money”, from the product labeling. This labeling claim is considered false and misleading. It implies that Nature’ is cheaper than other comparative product being sold in the marketplace.

Under the “Bather Comfort” section, make the labeling revisions to read as follows:

16. Delete the claim, “It’s, Nature’ patented mineral water treatment reduces the use of chlorine and bromine for a relaxing soak, free of harsh chemicals and overpowering odors. No efficacy data was provided and reviewed that supports that Nature2 reduces the need for the use of chlorine and bromine. This claim is considered false and misleading.

17. Delete the claim, “Nature’, technology reduces chlorine use and the formation of chloramines that causes odor and red eyes. No efficacy data was provided and reviewed that supports the product reduces the formation of chloramines. This claim is considered false and misleading.

Under the “Water Attributes” section, make the labeling revisions to read as follows:

- 18. Delete the claim, "For, Water that looks and feels luxurious", from the product label. This labeling claim implies that Nature' imparts properties that can make municipally treated look and feel luxurious. This claim is considered false and misleading.
- 19. Delete the claim, "Destroying bacteria for improved clarity" and "Helping to maintain a neutral pH for softer water" from the product labeling. The product does not identify the type of bacteria. No chemistry data was provided that the pH remains neutral that is the cause for softer water. This claim is considered false and misleading.
- 20. Delete the claim, "Nature' mineral condition the water for extra softness", from the product labeling. Nature' has metallic silver as an active ingredient not a mineral. No data was provided that supports this claim. This claim is considered false and misleading.
- 21. Delete the claim, "Nature' mineral makes a difference you can see and feel", from the product labeling. No data was provided and reviewed to support this claim. This claim is considered false and misleading.
- 22. Delete the claim, "The perfect combination for clear spa water", from the product labeling. "The perfect combination of " what , chlorine, algaecides?"
- 23. Delete the claim, "Water feels softer with a crystal clear shine", from the product label. This claim implies that Nature' imparts efficacious properties which make municipally treated water clear. This claim is considered false and misleading.

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

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

Sincerely,



Marshall Swindell  
 Product Manager 33  
 Regulatory Management Branch I  
 Antimicrobial Division(7510P)

5/42

{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}



# ZODIAC

Nature<sup>2</sup> SPA  
*mineral sanitizer  
for spas*

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

JUL 28 2008  
Under the Federal Insecticide  
Fungicide, and Rodenticide Act as  
amended, for the products,  
registered under EPA Reg. No.  
67712-15

## Mineral Sanitizer for Spas [/Hot Tubs]

The No Bromine Alternative\*

ACTIVE INGREDIENTS:

Metallic Silver** .....	0.92%
OTHER INGREDIENTS .....	99.08%
TOTAL.....	100.00%

\*\*From Silver Nitrate

KEEP OUT OF REACH OF CHILDREN  
CAUTION

SEE BACK [PANEL] FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No. 67712-15  
EPA Est. No. 67712-FL-001

NET CONTENTS: 98 GRAMS  
SPA CAPACITY: UP TO 500 GALLONS

\*Requires a small maintenance dose of non-chlorine oxidizer MPS (potassium peroxymonosulfate) and an EPA registered dichlor (Sodium dichloro-s-triazinetriene dihydrate) for initial and routine superoxidation and shock treatment.

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

6/42

{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}

Please refer to the [spa's] operating manual for complete installation instructions.

**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 [a] [the] Poison Control Center or [a] doctor immediately for treatment advice.

**STORAGE/DISPOSAL**

Storage – store in areas inaccessible to small children.  
Disposal – After four [six] months of use, discard cartridge in household trash. Do not save the cartridge for re-use. The cartridge is manufactured with mineral sealed media inside. In the unlikely event a cartridge breaks, remove it and vacuum out any media introduced into the spa 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.

**CHANGE THIS CARTRIDGE EVERY FOUR [SIX] MONTHS**

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

Zodiac Pool Care, Inc.  
2620 Commerce Way  
Vista, CA 92081

**ACCEPTED**  
**with COMMENTS**  
**in EPA Letter Dated:**  
**JUL 28 2008**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, and the Federal  
registered under EPA Reg. No.  
**67712-15**

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

7/42

{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}

**{Efficacy Claims}**

Advanced technology [sanitizes] spas [hot tubs]

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

Clear and Soft Water Sanitization for Your Spa [Hot Tub]

Continuous Silver Ion Sanitizer

Controls/kills/reduces/destroys bacteria

Disinfects spa water

Disinfects and sanitizes spa water

Inhibit[s] the growth of [undesirable] bacteria

Inhibits the growth of [undesirable] bacteria for brilliantly clear, odor-free spa [hot tub] water.

Kills bacteria

Kills [common, typical] spa bacteria [quickly, in a hurry]

Mineral sanitizer for spas [/hot tubs]

Mineral Spa sanitizer

Nature<sup>2</sup> Spa features Nature<sup>2</sup> Technology [,] [which] is an effective process that sanitizes spa water using minerals.

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

Patented mineral process assists in killing bacteria

Patented mineral process controls bacteria

Sanitizes water

Sanitizes spa [hot tub] water

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
JUL 28 2008

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

67712-15

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

8/42

{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}

[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>, {insert product name}] kills bacteria and lowers chlorine usage.

Spa Disinfectant

Spa Disinfectant & Sanitizer

[Spa] sanitized by Nature<sup>2</sup>

Spa [hot tub] Sanitizer

Specially formulated to control bacteria

The Nature<sup>2</sup> Spa effectively sanitizes your spa

The Spa Sanitizer

This cartridge continuously controls bacteria for [4][6] months in a spa [hot tub]

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

JUL 28 2008

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

67712-15

**{Ease of Use}**

Conveniently simple

Eliminate daily dosing

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

Enjoy the water

Enjoy your spa [with less work]

Enjoy your spa again – eliminate the need for daily dosing

{Insert product name} [cartridge] Lasts [up to] [a full] [4] [6] months!

{Insert product name} ends bromine hassle, and improves water quality.

{Insert product name} ends chlorine hassle, when used in combination with MPS\*, and improves water quality.

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



{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}

\*Potassium peroxymonosulfate *{The full name will either follow each use of the term MPS or asterisked and the term defined elsewhere on the label}*

Install[s] in seconds [right into your [spa] [the] filter [standpipe]]

Install[s] in seconds right into your [spa] filter [and] lasts [up to] [a full] [4] [6] months

[It] does the work for you

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

It's easy [to install!]

Less time maintaining, more time relaxing!

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

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

Quickly and easily install *{insert product name}*, then relax while it consistently and conveniently sanitizes your water for a full [4] [four] [6] [six] months.

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

Requires [only] a small maintenance dose of non-chlorine oxidizer (MPS\*) [after initial start-up with dichlor (Sodium dichloro-s-triazinetriene dihydrate)]

Save time

Simple, [effective, efficacious], cost effective

Simply replace the cartridge every [4][6] months

Spend more time in your spa, less time adding chlorine

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

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. [!]

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
JUL 28 2008

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

67712-15

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

10/42

{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}

**{Innovative Technology}**

21<sup>st</sup> century mineral technology

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

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

Bathe naturally with mineral technology

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

Combined mineral technology

Compatible with most spa [hot tub] maintenance products [including ozonators]\*\*\*\*

\*\*\*\* Do not use [this product] [Nature<sup>2</sup> Spa] with copper[-based] algaecides [algicides], [bromine or bromide [based] chemicals], or Biguanides (Baquacil<sup>®</sup>, [Baquaspa<sup>®</sup>], SoftSwim<sup>®</sup>, Revacil<sup>®</sup>). Baquacil<sup>®</sup> and BaquaSpa<sup>®</sup> are [Baquacil<sup>®</sup> is a] registered trademark[s] of {enter company name of owner of Baquacil<sup>®</sup> and Baquaspa<sup>®</sup>}. SoftSwim<sup>®</sup> is a registered trademark of {enter company name of owner of SoftSwim<sup>®</sup>}. Revacil is a registered trademark of {enter company name of owner of Revacil<sup>®</sup>}.

Bromine compatible *{for use only when bromine statement above is not used}*

Compatible with other maintenance products except [copper-based algaecides,] biguanide, [bromine or bromide based chemicals]

[Complete] [Nature<sup>2</sup>] mineral spa care works in all spas

**ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
JUL 28 2008**

Contains ionic silver

Contains minerals from nature

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

**Under the Federal Insecticide,  
Fungicide, and Herbicide Act as  
amended, for the purpose,  
registered under Reg. No.**

**67712-15**

Exclusive patented mineral technology<sup>†</sup>

† Nature<sup>2</sup><sup>®</sup> Spa technology consists of the mineral silver

Innovative spa [water] technology

[It's] Nature<sup>2</sup><sup>®</sup> technology<sup>†</sup>

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

11/42

{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}

It's Nature<sup>2®</sup>

[It's] compatible with most spa [hot tub] filtration systems

Mastering the elements

Mineral technology for the 21<sup>st</sup> century

The mineral cartridge

Nature<sup>2®</sup> inside

Nature<sup>2</sup> – it's elemental

Nature<sup>2®</sup> technology† is an effective process that sanitizes spa [hot tub] water using minerals

Nature<sup>2®</sup> technology† is compatible with ozonators

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

The Nature<sup>2®</sup> Spa is an exclusive patented mineral technology†

When used with MPS, the most recommended oxidant for spas, Nature<sup>2</sup> Spa delivers crystal clear water quality and an irritant-free spa experience.

[Zodiac –] [creators of, inventors of, pioneers in] spa mineral technology

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

**{Product Benefits}**

[An] alternative to chlorine [maintenance programs] when used in combination with MPS\*

[An] alternative to bromine [maintenance programs]

Lower chlorine levels help prevent damage to equipment and surfaces

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

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

Reduce Chlorine Usage when used in combination with MPS\*

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

**JUL 28 2008**

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

67712-15

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

12/42

{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}

Reduce[s] [your] chlorine use

Saves you money

[The] alternative to chlorine when used in combination with MPS\*

The alternative to bromine

Will not damage spa [hot tub] equipment or finish

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
JUL 28 2008

**{Bather Comfort}**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the products,  
registered under EPA Reg. No.  
67712-15

[It's, Nature<sup>2</sup>, {product name}] patented mineral water treatment reduces the use of chlorine and bromine for a relaxing soak, free of harsh chemicals and overpowering odors.

[Nature<sup>2</sup>, {product name}] minerals reduce the irritations associated with chlorine like red stinging eyes, faded swimsuits and dry, itchy skin

[Nature<sup>2</sup>, technology<sup>†</sup>, {product name}] reduces [chlorine use] [and] [the formation of chloramines] [that cause[s]] odor and red eyes.

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

[Nature<sup>2</sup>, {product name}] turns your spa into a luxurious escape.

Reduces [faded swimsuits, odor, red eyes]

Reduces chlorine irritations and odors

Reduces dry itchy skin [irritations] associated with chlorine

Reduces irritations [and odors] associated with chlorine [including red stinging eyes, dry itchy skin, faded bathing suits, premature damage to pool equipment or surfaces and unpleasant odors]

Reduces premature damage to spa equipment or surfaces associated with chlorine

Reduces red [stinging] eye[s] irritations associated with chlorine

Reduces unpleasant odors associated with chlorine

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

{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}

Spend the day [in the spa] without worrying about dry, itchy skin, red burning eyes or faded swimsuits

Reduces potential for unpleasant odor and scum lines

Enhanced bather comfort

Reduces potential for stinging eyes, skin irritation and unpleasant odors

**{Water Attributes}**

A difference you can see, feel and smell.

Brilliantly clear[,] [and] odor [-] free spa [hot tub] water

Clarif[y, ies] spa water

Compare the difference!

Crystal Clear water for your spa [hot tub]

For Crystal Clear Water in all types of spas [hot tubs]

For Sparkling Clear Water!

[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

{Insert product name} treated water is brilliantly clear and soft.

Keeps spa [hot tub] water clean and crystal clear

Makes water brilliantly clear [and] [soft]

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

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

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

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

JUL 28 2008

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

67712-15

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

{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}

Nature<sup>2</sup>® Spa sanitizer is odor free

No stain guarantee

No stains, guaranteed

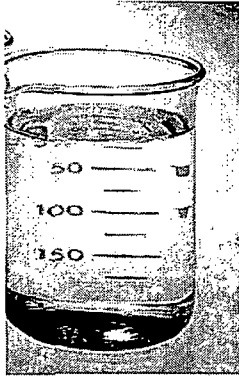
The perfect combination for clear spa water

Restores water quality

[The Nature<sup>2</sup>® Spa] improve[s] water quality

[The Nature<sup>2</sup>® Spa] restores water quality

Water feels softer with a crystal clear shine



ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
JUL 28 2008

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the products  
registered under EPA Reg. No.  
67712-15

{Insert Product Name} treated water is brilliantly clear and soft.

**{General Claims}**

Ask about the Nature<sup>2</sup>® Spa Test Strips!

Box part # {Insert number}

Compatible with [all {insert trade/spa/company name} spa models and the {insert trade/spa/company name}] ozone [system]

Custom designed for [your] {insert company (full or abbreviated) or spa name} [filter] [hot tub]

Designed to fit most portable spas

Designed to fit most portable spas [/hot tubs]

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

15/42

{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}

Don't forget your Nature<sup>2</sup> Spa Test Strips *{graphic of bottle may be included, other trade names for spa strips may be substituted for Nature<sup>2</sup> Spa}*

Ends routine usage of chlorine and bromine and restores water quality when used in conjunction with MPS\*

For customer assistance:

Contact your [local] *{insert product/spa name/company name}* Dealer. Locate a *{insert product/spa name/company name}* near you at *{insert web site}* or

Contact Zodiac Pool Care:

(phone) *{insert phone number}*

(e-mail) *{insert e-mail address}*

For use in portable [residential] spas [hot tubs] only

For hot tubs/spas

For more information about Nature<sup>2</sup> Spa Test Strips, contact your *{insert product/spa name/company name}* Dealer. For a *{insert product/spa name/company name}* near you go to *{insert web site}*.

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

[In order] To keep [your] [the] patented Nature<sup>2</sup><sup>®</sup> [Spa] sanitizer operating properly, it is important [necessary] to change [this] [the] cartridge every [4][6] months

*{Insert company/product names}* are [is a] [registered] trademark[s] of *{insert company name}*

*{Insert product name}* can even be used with your ozonator [chlorine generator].

[*{insert product name}*] is [Specifically [Exclusively]] designed for [to work in your] [to use with] *{insert company name/trade/product name}*

It's compatible

It's compatible – *{insert product name}* can even be used with your ozonator [chlorine generator]

[Made] [Assembled] in the USA [from components made in China and USA]

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

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
JUL 28 2008

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 67712-15

16/42

{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}

Made in U.S.A

Manufactured exclusively for {insert company name}

Mineral cartridge lasts 4 [6] months

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

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

Printed in the USA. Specifications subject to change without notice

Product part # {Insert number}

Satisfaction guaranteed

[The] {insert product name} [mineral sanitizer] is covered by the following U.S. patents; {insert patent numbers} {Note to reviewer – these patents 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}

The {insert product name} [mineral spa] [sanitizer] has been designed to work exclusively in {insert spa description and/or name} spas by utilizing water flow[ing] through the {insert description/name/company or product name} [filter] [water management] system

[The] [Nature<sup>2</sup>] {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}

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

[www.nature2.com](http://www.nature2.com)

[www.zodiacpoolcare.com](http://www.zodiacpoolcare.com)

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
JUL 28 2008

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the purpose,  
registered under Reg. No.  
67712-15

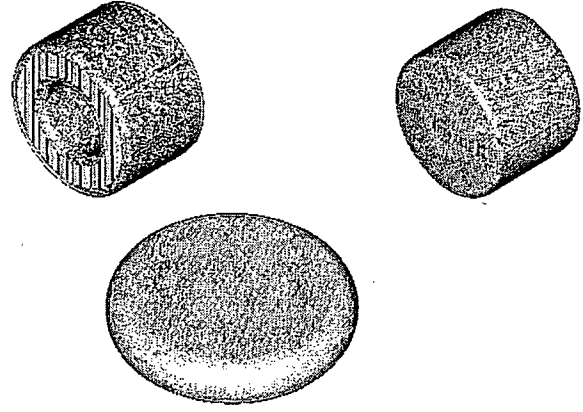
Note: Bracketed [ ] information is optional text/picture/diagram. Text separated by a comma (,) denotes and/or options {Bracket Text} is for administrative purposes. Punctuation, text size, text font, text color, capital letters, lower case letters, italics, bold and underline may vary on final printed labels. Spelling may vary when alternate spelling is acceptable; for example "algaecide" or "algicide" Any numbers on the label can be represented as a numeral or spelled out and decimals or fractions can be used where appropriate.



{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}

**{GRAPHICS AND ACCOMPANYING TEXT THAT ARE SPECIFIC TO OEM PRODUCTS. VARIOUS INSTALLATION DIRECTIONS ARE PROVIDED A LINE SEPARATES THE VARIOUS MODELS.}**

*{Below are graphics of prior cartridge models}*

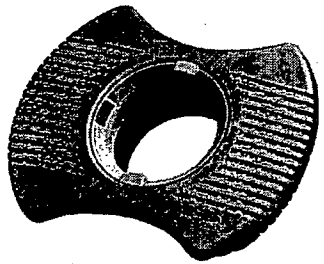


ACCEPTED  
with COMMENTS  
in EPA Letter Board:

**JUL 28 2008**

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

*{Below is the graphic of the current cartridge model}* 67712-15

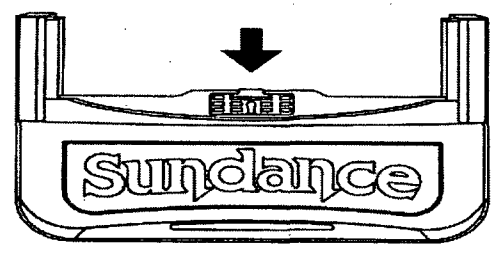


*{The cartridge names listed are not the product being registered. This list is provided to aid the consumer in determining equivalent replacements}*

This {insert product name} cartridge replaces any of the following parts for your Dimension One Spa:  
Pure Vision cartridge P/N :1512-111 Ultra Vision cartridge P/N : 1512-112 Crystal Vision cartridge P/N : 1512-80  
Retro-fits to all spas [hot tubs] with the following water management systems:  
Crystal Pure 1989-1996 (Crystal Vision cartridge)  
Ultra Pure 1996- current (Pure and Ultra Vision cartridges)  
Crystal Zone 1992 – current (Pure Vision cartridge)  
Clear Zone 1998 – current (Pure Vision cartridge)  
Vision Sanitizing System

---

Installs in seconds right into your filter gate sanitizer chamber



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

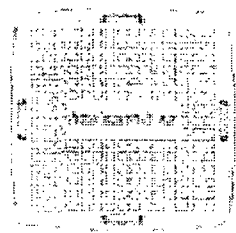
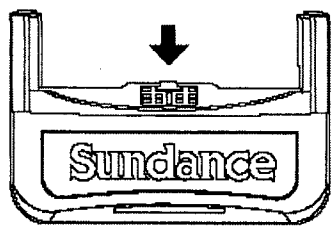
{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}

**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.



**ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
JUL 28 2008**

**Under the Federal Insecticide  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No.  
67712-15**

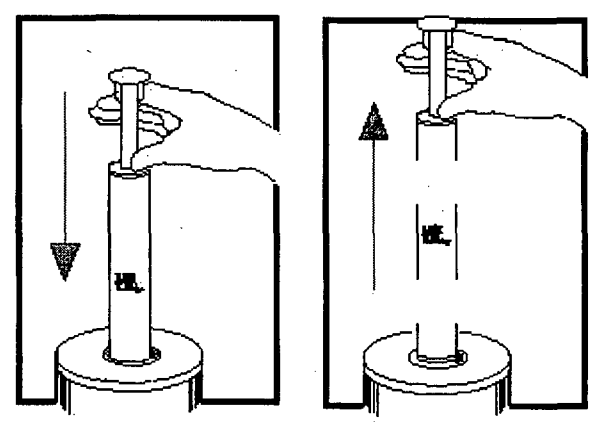
Note: Bracketed [ ] information is optional text/picture/diagram. Text separated by a comma (,) denotes and/or options {Bracket Text} is for administrative purposes. Punctuation, text size, text font, text color, capital letters, lower case letters, italics, bold and underline may vary on final printed labels. Spelling may vary when alternate spelling is acceptable; for example "algaecide" or "algicide" Any numbers on the label can be represented as a numeral or spelled out and decimals or fractions can be used where appropriate.

{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}



1. Attach handle to main body.
2. Remove silver cap from filter standpipe
3. Drop cartridge into filter standpipe, handle up.
4. Replace cap onto filter standpipe.

The {insert product name} cartridge comes in two parts, the main body and the handle.



**ACCEPTED**  
**with COMMENTS**  
**in EPA Letter Dated:**  
**JUL 28 2008**

Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act as  
 amended, for the pesticide,  
 registered under EPA Reg. No.  
**67712-15**

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

20/42

{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}



1. Attach extender to main cartridge.



2. Remove filter from spa.



3. Insert {insert product name} cartridge into bottom of filter.  
(Allow cartridge to rest on inside lip of filter.)



Replace this cartridge every 4 months.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
JUL 28 2008

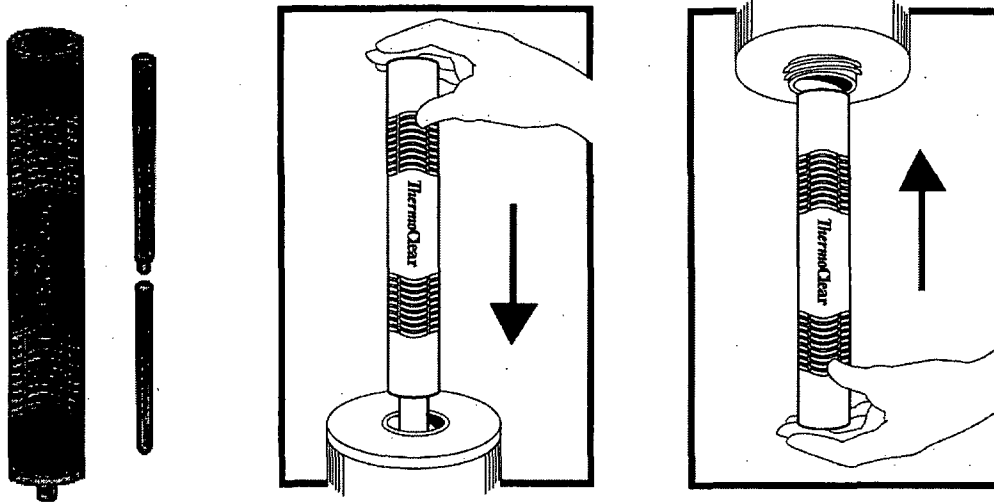
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for use, as a pesticide, registered under EPA Reg. No.

67712-15

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

21/42

{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}



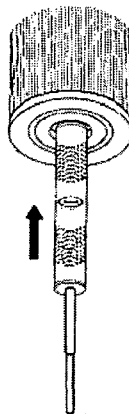
ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

JUL 28 2008

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

67712-15

1. Connect the support stems.
2. Slide the entire device into the core of your filter cartridge.
3. Adjust the location of the spa sanitizer.

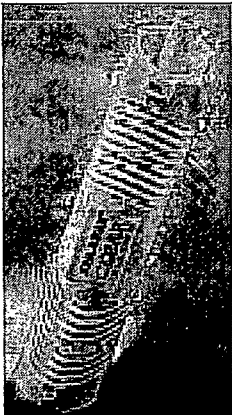


Installs in seconds  
right into your filter.

- 1 Connect the support stems.
- 2 Slide the entire device into the core of your spa filter cartridge.
- 3 Adjust the location of the spa sanitizer.

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

{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}



Cartridge installs in seconds

1. Remove handle core from filter.
2. Insert the {insert product name} cartridge into handle (turn to lock in place).
3. Replace handle core in filter.

**ACCEPTED**  
with **COMMENTS**  
in EPA Letter Dated:

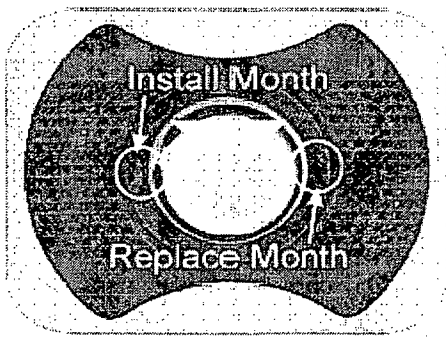
**JUL 28 2008**

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

67712-15

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

{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}



ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

**JUL 28 2008**

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

67712-15

**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 [over] 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:**

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

24/42

{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}

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 [the] 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*.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

**JUL 28 2008**

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

67712-15

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



{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}

**[ASSEMBLY AND INSTALLATION DIAGRAMS]**

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

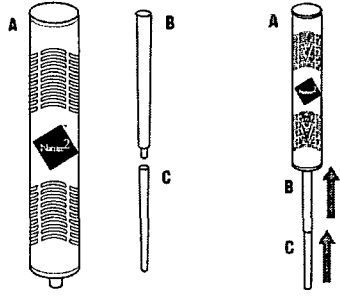
The main body [(A)] and two support stems [(B,C)].

- 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.]

---



ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
**JUL 28 2008**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide  
registered under EPA Reg. No. **67712-15**

- 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.]

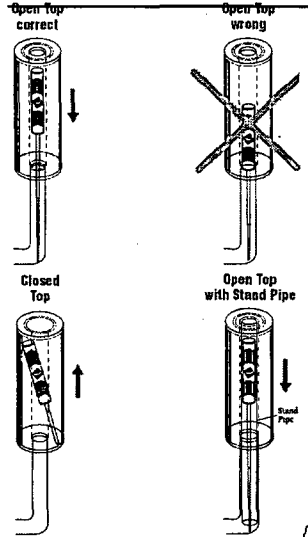
**[Closed Top]**

[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.]

---



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

{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}

[3 Adjust the location of the spa sanitizer]

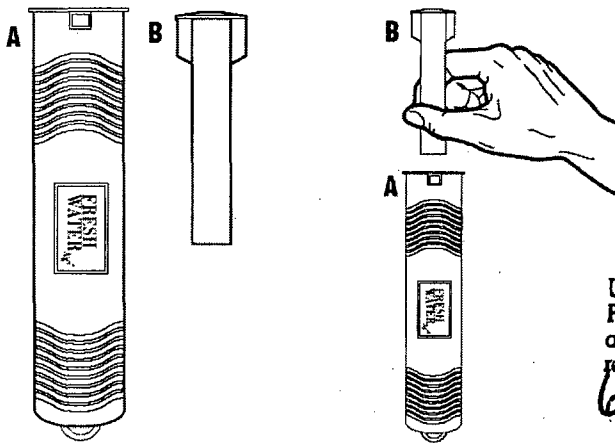
**ASSEMBLY AND INSTALLATION DIAGRAMS**

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].

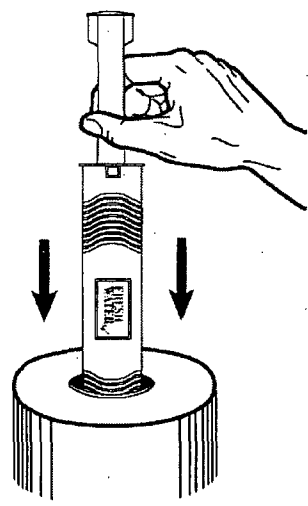
[Note: the {insert product name} is designed to fit most portable spas. {insert company name} assumes no liabilities for the product if installed in any way other than the methods described in this manual.]



ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
**JUL 28 2008**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the products,  
registered under EPA Reg. No.  
**67717-15**

- 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}

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

{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}

**[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.]**

---



ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
**JUL 28 2008**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No.  
**67712-15**

**[Figure 1]**

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

28/42

{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}

**[Installation:]**

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

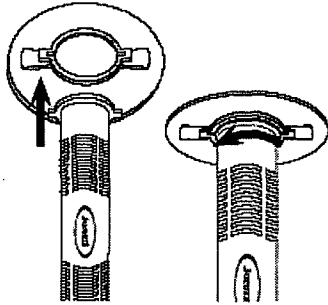
**[Step 1]**

Twist and remove filter cap.

**[Step 2]**

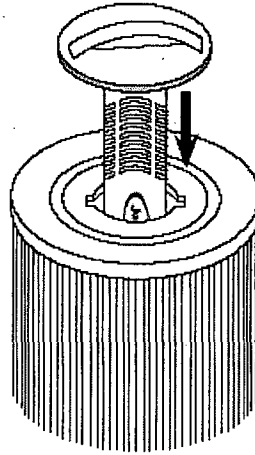
Match up tabs on {insert product name} [sanitizer] with tabs on {insert spa name} filter lid.

Twist sanitizer gently until it locks securely on the lid.



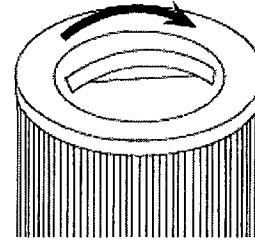
**[Step 3]**

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



**[Step 4]**

Lock cap into place.



ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
**JUL 28 2008**

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

**67712-15**

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

29/42

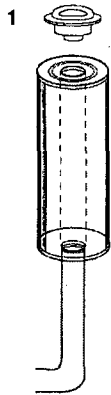
{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}

### Installation instructions

#### ASSEMBLY AND INSTALLATION DIAGRAMS

- 1 Remove cap from spa filter.

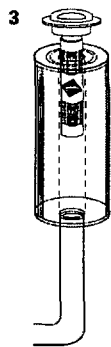
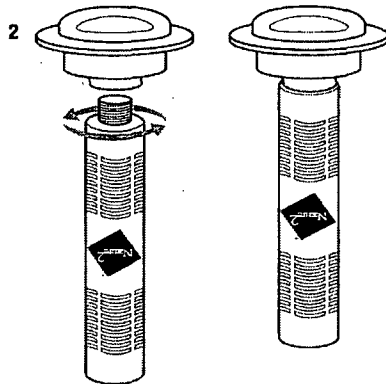
**Note:** The Artesian Mineral Spa Sanitizer is designed to fit most portable spas. Artesian Spas assumes no liabilities for the product if installed in any way other than the methods described in this manual.



ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
**JUL 28 2008**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for this pesticide,  
registered under EPA Reg. No.  
**67712-15**

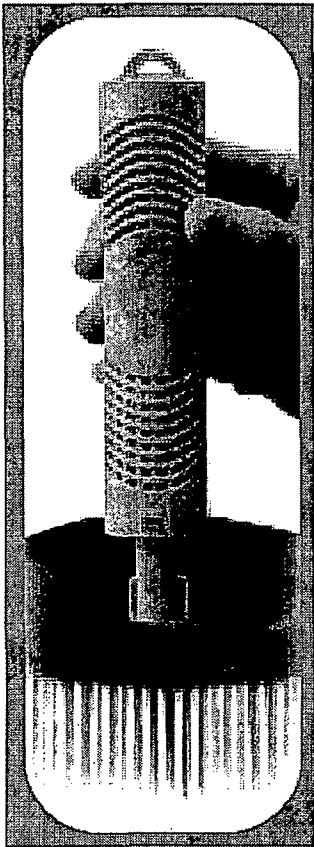
- 2 Screw Artesian Mineral Spa Sanitizer into the cap.
- 3 Insert Artesian Mineral Spa Sanitizer and filter cap into spa filter.



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

{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}

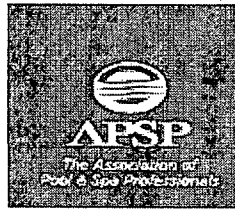
{Optional language/pictures/diagrams may appear on any panel of the carton label in any combination}



ACCEPTED  
with COMMENTS  
in EPA Letter Docket:

**JUL 28 2008**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the purposes,  
registered under EPA Reg. No.  
**67712-15**



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

31/42

{Optional language/pictures/diagrams that may appear on any panel of the carton label in any combination}



# ZODIAC

## Nature<sup>2</sup> SPA

*mineral sanitizer  
for spas*

## Owner's Manual

*{Supplementals will insert their company name and logo}*

with COMMENTS  
in EPA Label Dated:

**JUL 28 2008**

Under the Federal Insecticide  
Fungicide, and Herbicide Act as  
amended, for the use herein,  
registered under EPA Reg. No. 67712-15

EPA Reg. No. 67712-15

EPA Est. No. 67712-FL-001

**IMPORTANT: Spa Owner, save this manual!  
Installer, leave this manual with the spa owner!**

Nature<sup>2</sup> Spa has been designed to sanitize spas up to 500 gallons.  
*{Safety Instructions are optional}*

### Safety Instructions Important Information

Please read prior to installation



#### ATTENTION

Failure to heed the following can result in permanent injury, or drowning.

#### EQUIPMENT UNDER PRESSURE

- Always turn spa off prior to installing or changing Nature<sup>2</sup> Spa. Your spa system is operated under pressure and the pressure must be released before you begin work. Please see your spa 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 spa's operational system.

#### LOW CHLORINE RECIPE

- You must strictly follow the Nature<sup>2</sup> Spa 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

*{the precautionary statement and first aid are optional}*

#### 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> Spa is designed only for residential portable spas.]

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

32/42

**[WE ASK YOU TO TAKE THE TIME TO GET FAMILIAR WITH THIS MANUAL.]**  
[Thank you for purchasing Nature<sup>2</sup> Spa. We believe the more you know, the more enjoyable your family's bathing experience will be—and the more you will reduce the time, effort and cost of maintaining your spa. Spa owners who switch from conventional chemical programs to the Nature<sup>2</sup> Spa spend less time maintaining their spa. Every spa 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 spa. Remember, your authorized Nature<sup>2</sup> Spa dealer *{supplementals may insert appropriate dealer language}* can provide professional advice and service.]  
*{Optional Table of Contents, page numbers may change}*

<b>CONTENTS</b>	<b>PAGE</b>
Safety Instructions	1
Start Up	2
Balance the Water	3
Install the Nature <sup>2</sup> Spa	3
Recipe	4
Provide Filtration/Circulation	5
Nature <sup>2</sup> Spa Replacement Intervals	5
Disposal	5
Troubleshooting	6
Limited Warranty	10
Nature <sup>2</sup> Spa Test Strips	12

**ACCEPTED**  
**with COMMENTS**  
**in EPA Letter Dated:**  
**JUL 28 2008**  
  
**Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 67712-15**

**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> Spa can be used with all types of spa chemical treatments available **except [bromine and bromide based chemicals,] biguanide products (Baquacil<sup>1</sup>, BaquaSpa<sup>1</sup>, Softswim<sup>2</sup> or Revacil<sup>3</sup>) [and copper based algacides].**

---

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

---

*{The following optional compatibility statement may be used in place of the above language}*

**Attention**

Not to be used with product containing [Bromine], [Sodium bromide], [or] biguanides. If these products are being used, be sure to drain and refill with fresh water.



- Before starting up a new Nature<sup>2</sup> Spa, clean debris and algae out of the spa and spa equipment.

---

**Important:** *Do not install* the new Nature<sup>2</sup> Spa until the spa water is clean and chemically balanced.

---

- Balance spa water before installing Nature<sup>2</sup> Spa.
  - pH 7.2-7.6
  - Calcium Hardness 200-400 ppm
  - Total Alkalinity [(TA)] 80-120 ppm
 [Total Dissolved Solids (TDS) 300-2000 ppm]  
 [Test for iron, copper and manganese – add a sequestering agent per instructions if present.]  
 [Consult with your Nature<sup>2</sup> dealer for specific water balance instructions.]

<sup>1</sup> A Trademark of {enter company name of owner of Baquacil<sup>®</sup> and Baquaspa<sup>®</sup>}  
<sup>2</sup> A Trademark of {enter company name of owner of SoftSwim<sup>®</sup>}  
<sup>3</sup> A Trademark of {enter company name of owner of Revacil<sup>®</sup>}

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



{The following "Balance the Water" section is optional}

To find out if your spa water is balanced:

- take a water sample to your dealer to be tested regularly, or
- ask your dealer to recommend a spa test kit for water balance.

---

**Element:** pH  
**Range:** 7.2-7.6  
**If it's too low:** The surface of your spa can become etched. Metal parts in the pump and plumbing will corrode.  
**How to fix:** Add pH increaser.  
**If it's too high:** "Scale" forms on the surface of your spa. The water can become cloudy. Equipment can become damaged.  
**How to fix:** Add pH decreaser.

---

**Element:** Calcium Hardness  
**Range:** 200-400 ppm  
**If it's too high:** Rough, discolored deposits ("scale") will form on the spa surface and inside spa equipment.  
**How to fix:** Drain or dilute the spa water. Consult your dealer.

---

**Element:** Total Alkalinity  
**Range:** 80-120 ppm  
**If it's too low:** It provides no buffer so that you constantly get fluctuating pH readings, which can damage equipment and spa surfaces  
**How to fix:** Use an alkalinity increaser.  
**If it's too high:** The water becomes cloudy or milky white.  
**How to fix:** Add acid to bring alkalinity down.

ACCEPTED  
 with COMMENTS  
 in EPA Letter Dated:  
 JUL 28 2008  
 Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act as  
 amended, for the products  
 registered under EPA Reg. No.

67712-15

## Install the Nature<sup>2</sup> Spa

- 1 **Drain and refill your spa.** Balance water per spa manufacturer guidelines.
- 2 **Install the Nature<sup>2</sup> Spa** after water is balanced. Refer to [your] [Nature<sup>2</sup> Spa operating manual] [Assembly and Installation Diagrams below] for [additional] instructions regarding your particular model's installation.
- 3 **Superoxidize the spa water** with an EPA registered source of chlorine according to manufacturer's instructions to burn off contaminants and activate cartridge.

**Important:** Initial superoxidation with dichlor<sup>4</sup> is required to burn off contaminants and activate cartridge.

- 4 **Run spa** according to recommendations supplied to you by the manufacturer of your spa.

{Optional Installation(start-up) instructions}

{Insert name} cartridge:

1. Add 1 ½ tablespoons of dichlor<sup>4</sup> to spa per 250 gallons (approx. 1000 liters).  
 Note: 1 ½ tablespoons is approximately ¾ oz or 24 grams.  
 [If adding sequestering agent, wait 48 hours before adding {insert product name}.]

Do not enter the spa if the free available chlorine residual is over 5 ppm.

<sup>4</sup> Sodium dichloro-s-triazinetrione dihydrate

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

34/42

[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> spa.]

{The low chlorine recipe is optional language}

### Low-Chlorine Recipe

#### Ingredients:

- Nature<sup>2</sup> Spa
- Non-chlorine oxidizer (MPS<sup>5</sup>)<sup>6</sup>
- Nature<sup>2</sup> Spa Test Strips<sup>7</sup>, or equivalent, (MPS<sup>5</sup>, pH, total alkalinity)
- pH, hardness and total alkalinity adjusting chemicals
- Dichlor<sup>4</sup>, EPA registered source

{This section is required}

#### When:

#### What to do:

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

JUL 28 2008

Under the Federal Insecticide  
Fungicide, and Rodenticide Act as  
amended, for the pesticide  
registered under EPA Reg. No. 67712-15

<b>Every day</b>	Run spa according to recommendations supplied to you by the manufacturer of your spa.
<b>Before each use</b>	Test the water with the Nature <sup>2</sup> Spa Test Strip (or equivalent). If the MPS <sup>5</sup> level is low, add 1 tablespoon of MPS <sup>5</sup> to spa per 250 gallons (approx. 1000 liters). (Note: 1 tablespoon is approximately ½ ounce or 16 grams) Use the Nature <sup>2</sup> Spa Test Strip (or equivalent) to test the spa water after each addition of MPS <sup>5</sup> . If the test strip indicates levels below the OK range, add 1 tablespoon MPS <sup>5</sup> to spa per 250 gallons and re-test. Enter spa only after test strip indicates a sufficient level of MPS <sup>5</sup> .
<b>After each use</b>	Add 1 tablespoon of MPS <sup>5</sup> to spa per 250 gallons (approx. 1000 liters)
<b>Once per week</b>	Adjust the pH, total alkalinity and hardness as needed. A convenient way to test pH and total alkalinity is the use of the Nature <sup>2</sup> Spa Test Strip.
<b>Every 4 [6] months</b>	Drain and refill your spa. Replace Nature <sup>2</sup> Spa, repeat sanitizer start-up.
<b>As needed</b>	Shock treat with 1.5 tablespoons of an EPA registered source of dichlor <sup>4</sup> per 250 gallons (approx. 1000 liters) to remedy problems which may occur when bathing loads are high, when successive MPS <sup>5</sup> test strip reading indicate high demand, when water appears hazy or dull, when unpleasant odors or eye irritation occur, after heavy wind and rainstorms or if foam develops.

<sup>5</sup> Potassium peroxymonosulfate

<sup>6</sup> MPS may cause a lowering of the pH and total alkalinity of your spa water. Please monitor pH and total alkalinity at least once per week and adjust accordingly.

<sup>7</sup> Nature<sup>2</sup> Spa Test Strips are available at your local Zodiac Nature<sup>2</sup> Dealer

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

35/42

**Note:** As an alternative to MPS<sup>5</sup>, an EPA registered source of dichlor<sup>4</sup> may be substituted: 1  
tablespoon dichlor<sup>4</sup> = approximately 3 tablespoons MPS.<sup>5</sup>

**Important:** Perform start-up procedures for spas which have been unused or unattended. The  
Nature<sup>2</sup> Spa is not to be used with products containing [bromine], [sodium bromide] [or]  
biguanides. If these products are being used, **BE SURE TO DRAIN AND REFILL SPA WITH  
FRESH WATER.**

*{This section is optional}*



**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 four hours a day.  
Consult your Nature<sup>2</sup> dealer for optimum run times.



**Filtration**      Check the spa's filter periodically and clean it as recommended by the  
manufacturer.

## Nature<sup>2</sup> Spa Replacement Intervals

[Use the month indicator decal to identify the date on which the cartridge should be replaced.  
Always turn spa off prior to installing or changing Nature<sup>2</sup> Spa. Your spa is operated under  
pressure and the pressure must be released before you begin work. Please see your spa owner's  
manual for instructions.]

A cartridge lasts four (4) [six (6)] months. The cartridge should not be used longer than four (4)  
[six (6)] months.

## Disposal

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

**ACCEPTED  
with COMMENTS  
in EPA Letter Dated:**

**JUL 28 2008**

**Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, this product is  
registered under EPA Reg. No.**

**67712-15**

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

36/42



{The troubleshooting guides are optional}

	<b>Problem</b>	<b>What to look for</b>
<b>Cloudy Water</b> Frequently caused by improper start up. See section on Start Up and install the Cartridge	Spa Filtration	Slow filter turnover rates
	Algae Growth	Hazy spa water; may have slightly green appearance
	Unbalanced water	1. High hardness 2. High TDS (total dissolved solids) 3. High pH 4. High total alkalinity
<b>Algae</b> Algae may be caused by insufficient levels of oxidizer and/or inadequate water circulation	Green or white algae  <b>Note:</b> Do not use algae treatments containing [either copper or] sodium bromide	Pea green to white color; attaches to spa walls; sometimes colors the entire body of water
<b>Stains</b>	Blue/green	Copper or iron from spa equipment corrosion or water supply
	Red /brown	Iron or manganese from equipment corrosion or water supply
	Black	Manganese in water supply
	Metal tarnishing	High native mineral content in water; unbalanced water
<b>Scale</b> Crusty deposits on spa surfaces		High pH and high total alkalinity
		High TDS (total dissolved solids) or high hardness [levels]

Scale  
ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
JUL 28 2008

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

67712-15

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

37/42

**Treatment**

---

- 1 Backwash and clean filter
  - 2 Run filter for 24 hours
  - 3 Increase run time per day
- 

Superchlorinate water with [an] EPA registered source of dichlor<sup>4</sup> according to manufacturer's instructions.

---

Balance the spa water

---

- 1 Check pH and adjust if necessary
- 2 Superchlorinate water with an EPA registered source of dichlor<sup>4</sup> according to manufacturer's instructions.
- 3 Repeat steps 1 and 2 until algae is gone

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

III 28 2008

---

- 1 Adjust pH and total alkalinity to ideal ranges.
  - 2 Vigorously brush stained areas
  - 3 Add sequestrant [per installation instructions]
  - 4 Run filter
  - 5 Twelve hours later, superchlorinate the spa
  - 6 Test and balance water
  - 7 Test spa water for dissolved metals
- 

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No.  
**67712-15**

Clean with soft cloth and mild detergent. Test water for minerals; use a sequestrant; maintain water balance

---

Adjust pH and total alkalinity to ideal ranges

---

- 1 Replace a volume of spa water with water low in hardness and dissolved solids.
- 2 Use sequestrant [per installation instructions] to prevent scale buildup if high hardness [levels are] is a continuing problem.
- 3 If remedial action has been taken, and problem still persists, drain and refill spa [water].

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

{Optional troubleshooting section}

### Troubleshooting

If you have never tested your water conditions, or if your water source has changed, you will need to retest your water to determine your water's basic characteristics. When testing your water, always start with clean, fresh water. When using {insert name}, DO NOT follow the standard Water Care instructions in your Spa Owner's Manual. Please use the following instructions for the water chemistry start-up.

**Step 1:** Test your "source water" for Calcium Hardness, Total Dissolved Solids (TDS) and metals (i.e. Iron, Copper, Manganese). Consult with an authorized {insert dealer name} Dealer if you need assistance testing your "source water". Knowing these three "source water" conditions is important to properly balance your spa water. Properly balanced water can greatly prolong the longevity of your spa's equipment and make it easier to maintain clean clear water. The following three "source water" conditions typically should be tested once per week, and should be retested if you move or if your "source water" changes.

- a) Calcium Hardness levels should be between 200 and 400 ppm (parts per million). If it is not, use Calcium – Hardness Increaser (Calcium Chloride) to raise the Calcium Hardness level accordingly. (Acceptable range is 200 -400 ppm).
- b) TDS should be above 300 ppm. Example: If your Calcium Hardness is 200 ppm and the TDS is only 200 then you may add 1.5 oz. Sodium Chloride (common table salt) to raise TDS to the 300 ppm (minimum ppm). 1 oz. of Sodium Chloride per 100 gallons of spa water will raise TDS by approx 63 ppm. (Acceptable range is 300 -2000 ppm).
- c) If metals are present add recommended dosage of a sequestrant agent, while water is being added to the spa. Wait 48 hours after adding sequestrant before installing cartridge.

**Tip: Estimated Equivalents:**

- 3 teaspoons = 1 tablespoon
- 2 tablespoons = 1 ounce

ACCEPTED  
 COMMENTS  
 EPA Letter Defect  
**JUL 28 2008**  
 Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act as  
 amended, for the pesticide,  
 registered under EPA Reg. No.  
 67472-15

**Step 2:** Test the Total Alkalinity (TA) and pH utilizing Test Strips. With the jets turned off, dip the test strip 12-18 inches into the water and swirl three times for an accurate reading (be sure to follow the procedures as detailed on the container). TA should read between 80-120 ppm and pH should read between 7.2-7.6. Please use the following guidelines should you need to make adjustments:

a) Water Condition:

**Total Alkalinity above 120 ppm**

Add 1 ounce of pH/Alkalinity Decreaser with the jets turned off, into the center of the spa. Wait 1 minute, then turn jets on and run at high speed for at least 5 minutes. Turn jets off, retest and repeat procedure until the TA reads close to 80 ppm. {change made to be consistent with established specifications}

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

39/42

**Tip:** When Total Alkalinity is above 120 ppm the pH will change slower than the Total Alkalinity.

b) Water Condition:

**Total Alkalinity below 80 ppm**

Add 1 ounce of pH/Alkalinity Increaser with the jets turned on high speed. Continue running jets on high speed for at least 5 minutes. Turn jets off, retest and repeat procedure until the TA reads close to 80 ppm.

**Tip:** When Total Alkalinity is below 80 ppm the pH will change faster than the Total Alkalinity.

c) Water Condition:

**pH above 7.6**

Test and adjust Total Alkalinity per the above instructions then test and balance the pH. Add 1 ounce of pH/Alkalinity Decreaser with the jets turned to high speed. Continue running jets on high for at least 5 minutes. Turn jets off, retest and repeat procedure until the pH reads between 7.2 - 7.6.

d) Water Condition:

**pH below 7.2**

Test and adjust Total Alkalinity per the above instructions then test and balance the pH. Add 1 ounce of pH/Alkalinity Increaser with the jets turned to high speed. Continue running jets on high for at least 5 minutes. Turn jets off, retest and repeat procedure until the pH reads between 7.2 - 7.6.

**Step 3:** Add 1.5 tablespoons dichlor<sup>4</sup> to spa per 250 gallons (approx. 1000 liters).

ACCEPTED  
with COMMENTS  
in EPA Letter Direct

JUL 28 2008

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

67712-15

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

40/42

{This section is optional}

## Limited Warranty

### NATURE<sup>2</sup> SPA LIMITED WARRANTY

The limited warranties contained within this document are the only warranties given with your Nature<sup>2</sup> Spa 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> Spa. The Nature<sup>2</sup> warranty applies to the original owner only.

### THE LIMITED WARRANTIES OF THE NATURE<sup>2</sup> SPA ARE:

Nature<sup>2</sup> Spa is warranted to be free of defects in materials and to perform satisfactorily for a period of four [six] months from the date of purchase. Nature<sup>2</sup> Spa is warranted not to cause staining in your spa. This limited warranty requires that you exercise reasonable care of your spa and keep water in balance at all times. This limited warranty does not cover discoloration to chromium fittings. This warranty does not cover cartridges used with any biguanide products such as BaquaSpa<sup>®1</sup>, Baquacil<sup>®1</sup> or Soft Swim<sup>®2</sup> [or any products containing Bromine or Bromine-based chemicals]. If the cartridge is defective and does not perform satisfactorily for the entire four [six] months, we will replace the cartridge.

### EXCLUSIONS FROM WARRANTY

Nature<sup>2</sup> Spa is designed for use on residential portable spas up to 500 gallons. If it is used in any other application, the warranty is void, and the purchaser and/or spa owner releases the manufacturer from any and all claims related to the use of the Nature<sup>2</sup> Spa.

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 Care, Inc. by calling 1-888-537-6657. Only the original purchaser may submit a claim under this limited warranty. ~~Claims must be accompanied by an original purchase receipt.~~

ACCEPTED  
with COMMENTS  
in EPA Log. No. Dated:  
JUL 28 2008

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

67712-15

Nature2 is a registered trademark of Zodiac Pool Care, Inc.  
© Copyright 2008 Zodiac Pool Care, Inc.

Printed in the USA  
WXXXXX

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



41/42

## Nature<sup>2</sup> Spa Test Strips

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-xxxx.

For more information about Nature<sup>2</sup> Spa Test Strips, contact your {insert product/spa name/company name} Dealer. For a {insert product/spa name/company name} near you go to {insert web site}.

For customer assistance:  
Contact your [local] {insert product/spa name/company name} Dealer. Locate a {insert product/spa name/company name} near you at {insert web site} or  
Contact Zodiac Pool Care:  
(phone) {insert phone number}  
(e-mail) {insert e-mail address}

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
JUL 28 2008

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No.  
67712-15

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

42/42

{Optional language}

{Insert product name} Notes:

- Replace the {insert product name} cartridge every six months. Refer to the Date Ring to help you remember when it is time to replace it.
- As {insert product name} does not eliminate the need to maintain the other aspects of optimum water treatment, we also suggest using Enzyme Formula on a weekly basis to reduce the occurrence of waterlines on the shell.
- The combination of {insert product name} plus an oxidizer is designed to significantly reduce the need for conventional sanitizers. It is important to realize, however, that any sanitizer or bactericide can be over-taxed, meaning that an EPA registered source of chlorine may need to be used from time to time in small dosages.
- {Insert product name} has a relatively neutral pH (7.4) and will help minimize the undesirable accumulation of high total dissolved solids (TDS) commonly experienced with the use of conventional chemical sanitizer maintenance schedules.
- Stain & Scale and Metal Sequestrant products are to be used only upon start-up and/or water changes, AT LEAST 48 HOURS PRIOR TO INSTALLING THE {INSERT PRODUCT NAME} CARTRIDGE, as they may reduce the effectiveness of {insert product name}.
- If the water is significantly cloudy or any odor is present in the water, do not enter the spa. Test and balance TA and pH as needed, and add 1.5 tablespoons dichlor<sup>4</sup> to spa per 250 gallons (approx. 1000 liters). Do not enter the spa if the free available chlorine residual is over 5 ppm.
- Water clarity is obtained by properly balanced water and good filtration. If either is not correct, the water may appear cloudy or dull. Check the spa's filter periodically and clean it as recommended by the manufacturer.
- Remember that hot water can carry many forms of bacteria, but the combination of {insert product name} plus an oxidizer, like Chlorine and MPS<sup>5</sup>, is not a guarantee for "bacteria-free" water. Maintaining your spa in accordance with manufacturer's suggested guidelines will help ensure clear and enjoyable water.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
JUL 28 2008

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the purpose  
registered under EPA Reg. No.  
67712-15

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