

JUL 8 1999

Aqua Pure International
880 Jupiter Park Drive, #4
Jupiter, Florida 33458

Attention: Sue Crescenzi
Senior Regulatory Specialist

Subject: Chlor-Free, Water Treatment for Pools
EPA Registration Number 70131-1
Your Amendment Dated January 11, 1999

This is in response to your amendment on the above product to change the signal word from "Caution" to "Warning".

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provide that you make the labeling change listed below before you release the product for shipment bearing the amended labeling.

- 1. Revise the "Precautionary Statements" to read:

Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Harmful if swallowed. Wear protective eyewear (goggles or face shield). Avoid breathing dust. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

- 2. Under the "First Aid" Statement revise the "If Swallowed" and "If Inhaled" to read:

If Swallowed: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

If Inhaled: Remove victim to fresh air.

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

The acute inhalation study was graded supplementary due to the fact that the study did not indicate the exact age of the test animal, only that it was a young adult. However, that should not affect the outcome of the study. Additionally, where a whole body chamber is used to expose animals to an aerosol, individual housing must be used in inhalation chambers to minimize crowding of the test animals and maximize their exposure to the test substance. You did not indicate whether or not this was performed. Please indicate what was done to this regard, so that the study may be upgraded.

The Acute Toxicity Profile for EPA Reg. No. 70131 is as follows:

Acute Oral Toxicity	III	Acceptable
Acute Dermal Toxicity	IV	Acceptable
Acute Inhalation Toxicity		Supplementary
Primary Eye Irritation	II	Acceptable
Primary Dermal Irritation	III	Acceptable
Dermal Sensitization	Non-sensitizer	Acceptable

If you have questions concerning this letter, please contact Delores Williams at (703) 308-6372.

Sincerely,



Robert S. Brennis
Product Manager (32)
Regulatory Management Branch II
Antimicrobials Division (7510C)

REGISTERED
with the EPA
under EPA Order 1000

JUL 8 1999

70131-1



WATER TREATMENT FOR POOLS

REMOVES CHLOROPHYLL FROM WATER

**CONTROLS ALGAE
LOWERS pH LEVELS
CLEANS POOL WATER**

EPA REG. No. 70131-1 • EPA EST. No. 42198-CA-1

Active Ingredients:
Copper Sulfate 1.6%
Inert Ingredients 98.4%
100%

**WARNING
KEEP OUT OF REACH OF CHILDREN**

NET WEIGHT: 20 lbs.

DIRECTIONS FOR USE

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

PRE-CONVERSION:

For best results take these steps before conversion.

1. **Filter Cleaning.** THE MOST IMPORTANT FUNCTION A POOL OWNER CAN DO IS TO KEEP THE FILTER CLEAN. Sand Filters must be open manual backwashed. If unable to open manual backwash clean in this manner:
 - a. Use filter flush/cleaning side.
 - b. Backwash filter 7 to 10 minutes.
 - c. Rinse 1 minute.
 - d. Repeat steps b & c.
 - e. Back to filter.

Summer: weekly cleaning. Winter: bimonthly cleaning.

2. **Pool Water Balance.** Ideal Ranges are: T.A.: 80-100 ppm, Calcium: 250-400 ppm, TDS less than 2000 ppm. Post conversion, to maintain pool refer to dosage chart.

CONVERSION: The pool is now balanced. To convert, simply dissolve the product in water, then pour into the deep end near return jets. Average pool size (15,000 gallons) requires 5 lbs. to convert.

**POST CONVERSION:
Normal Maintenance**

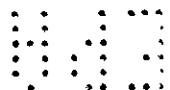
1-2 days after conversion:

1. Brush walls and vacuum pool. After conversion, pool should be brushed and/or vacuumed weekly.
2. Clean, rinse and/or backwash filtration system.
3. Check T.A., Calcium and pH levels, adjust (if needed) to ideal range. T.A. and Calcium should be monitored on a monthly basis. To adjust Calcium & T.A. refer to Trouble Shooting on label.
4. Level of Sanitizer Present may be checked with the Taylor Tech. DPD Reagents 1 and 2. Add 5 drops of each to 9 ml of water, invert to mix. Let stand for 7-10 minutes. Reading of 1.5 ppm or higher indicates sufficient sanitizer.
5. Algacide level: Use standard copper test kit. Copper levels: 0.2 ppm - 0.4 ppm.

IMPORTANT: The dosage of the product is *always* measured by the pH level, *never* by the level of sanitizer present.

If not used properly or as directed, the product may cause staining.

Distributed by Aqua Pure International, Jupiter, FL 33177 • Manufactured by NACCO, Gardena, CA 90248
USA Patented • Made in the USA



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STORAGE AND DISPOSAL

STORAGE: Keep product dry in tightly closed container when not in use. Store in cool, dry, well ventilated area away from heat or open flame. Store in Original Container and in Locked Area. Do not contaminate water, food or feed by storage or disposal. In case of decomposition isolate container and flood with large amounts of water to dissolve all material before discarding. **DO NOT mix with other chemicals.**

DISPOSAL: Securely wrap original container in several layers of newspaper and discard in trash. Do not reuse container. Rinse thoroughly before discarding in trash.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

FIRST AID • FIRST AID • FIRST AID

IF IN EYES: Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.

IF SWALLOWED: Call a doctor or get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists. **IF INHALED:** Move to fresh air.

TROUBLE SHOOTING

1. Pool has a Green Tint:
 - a. CLEAN FILTER.
 - b. Make sure pool pump is on for 8 hr. minimum.
 - c. Test pH add the product as needed.
 - d. Test the T. A., if low add Sodium Bicarbonate (2lbs. per 15,000 gallons to increase by 10 ppm). If high use dry acid (sodium bisulfate) to lower T. A. (3 lbs. to decrease by 10 ppm).
 - e. Test the Calcium, if low add Calcium Chloride (2lbs. per 15,000 gallons to increase by 10 ppm). Test Calcium level after 24 hours, add Calcium Chloride until pool reaches ideal range.
 - f. 2-3 days after treatment vacuum pool and clean filter, adjust the pH with the product.

GREEN, MUSTARD, & BLACK ALGAE TREATMENT (i.e., 15,000 gallon pool)

1. **Isolated Algae Growth On Pool Surface:**
 - a. CLEAN FILTER.
 - b. Add 2-3 ounces of powdered copper sulfate (99.8%) and dissolve with the product (based on pH level) in water, then pour into the deep end near return jets.
 - c. Brush entire pool surface.
 - d. 2-3 days after treatment vacuum pool and clean filter.
2. **Very Noticeable Algae Growth on Pool Surface:**
 - a. CLEAN FILTER
 - b. Add 5-6 ounces of powdered copper sulfate (99.8%) and dissolve with 2 1/2 lbs. of the product in water, then pour into the deep end near return jets.
 - c. Brush entire pool surface.
 - d. 2-3 days after treatment vacuum pool and clean filter.
3. **Full Blown Algae Outbreak on Surface and in Water:**
 - a. CLEAN FILTER.
 - b. Add 8-10 ounces of powdered copper sulfate (99.8%) and dissolve with 5 lbs. of the product in water, then pour into the deep end near return jets.
 - c. Brush entire pool surface.
 - d. 2-3 days after treatment vacuum pool and clean filter.

NOTE: After treating pool with copper sulfate, swimmers should wait 48 hours before using pool.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals
WARNING: Harmful if swallowed. Avoid contact with skin. Wash thoroughly with soap and water after handling. Avoid breathing dust. Do not get in eyes or on clothing. Causes substantial but temporary eye injury. Remove and wash contaminated clothing after use.

DOSAGE CHART TO MAINTAIN A POOL BY pH LEVEL

pH	Pool Size (1,000 gallons)							
	10-15 gal	20 gal	30 gal	40 gal	50 gal	60 gal	70 gal	80 gal
8.0 pH	5 cups	5 cups	8 cups	10 cups	13 cups	16 cups	18 cups	20 cups
7.9 pH	4 cups	5 cups	8 cups	9 cups	12 cups	16 cups	16 cups	18 cups
7.8 pH	4 cups	4 cups	7 cups	8 cups	10 cups	12 cups	14 cups	16 cups
7.7 pH	3 cups	4 cups	6 cups	7 cups	8 cups	10 cups	10 cups	14 cups
7.6 pH	3 cups	3 cups	6 cups	7 cups	7 cups	8 cups	10 cups	14 cups
7.5 pH	2 cups	3 cups	4 cups	6 cups	6.5 cups	8 cups	8 cups	10 cups
7.4 pH	2 cup	2 cups	4 cups	4.5 cups	5 cups	6 cups	7 cups	8 cups
7.3 pH	1 cup	1.5 cups	2 cups	3.5 cups	4.5 cups	6 cups	6.5 cups	7 cups
7.2 pH	OK	OK	OK	OK	OK	OK	OK	OK

Note: One (1) Cup filled to 6 ounce mark is equal to 1/2 pound.