

71537-1

7/15/2003

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Deanna Gilbreath, Agent for Clear Source One, LLC  
 c/o SRC Scientific & Regulatory Consultants, Inc.  
 P.O. Box 1014  
 Columbia City, IN 46725

Subject: **C-Pool Natural Balance; EPA Reg. No. 71537-1  
 Your Amendment Dated 4/17/03**

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, to revise the label by updating the "First Aid" section, add new claims, and to add the alternate brand name "Clear Source One", is acceptable providing you submit three copies of a final printed label which makes only the three changes listed below. The Agency blacked out these deficiencies on the attached label.

1. Delete "by at least 50%" in the claim "Reduces chlorine by at least 50%". Adequate qualification and substantiation was not submitted for this new numerical claim. For example, no evidence/data was submitted to support your separate justification statement that use of this product actually results in a free available chlorine requirement reduction of 50% (from 3 ppm to 1.5 ppm, or similar). Numerical reduction claims for the similar products you referenced will also be required to be removed. The limited claim for "Reduces chlorine use" is acceptable based on similar claims on other algaecide products (eg., EPA Reg. No.'s 73123-1; 71146-2; 71686-1).
2. Delete "Add chlorine to achieve an ideal reading of 1.5 ppm". It is not appropriate for this product to provide use directions for another pesticide product containing a different active ingredient.
3. Delete the second repeating set of "Precautionary Statements". Only one set is allowed per label.

A copy of the stamped label is attached. If you have any questions about the comments in this letter, please feel free to contact Tony Kish at 703-308-9443, or myself at 703-308-6341.

Sincerely,



Marshall Swindell,  
 Product Manager Team 33,

CONCURRENCES

Regulatory Management Branch I  
 Antimicrobials Division (7510C)

SYMBOL	CONCURRENCES					
SURNAME						
DATE						

Natural Mineral Balance and Algaecide



Simplify Pool Care  
NET WT. 7 lbs.

**ACTIVE INGREDIENT:**  
Copper as metallic\*.....3.125%  
OTHER INGREDIENTS.....96.875%  
TOTAL:.....100.000%  
\*From Copper Sulfate Pentahydrate

**KEEP OUT OF REACH OF CHILDREN  
WARNING**

SEE FIRST AID STATEMENT AND OTHER PRECAUTIONS  
ON SIDE PANEL BEFORE OPENING CONTAINER.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

JUL 15 2003

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

71537-1

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Reduces Chlorine  
use]

Eliminates  
algae growth

Keeps pool water  
crystal clear

Stabilizes pH

**ELMINATES/CONTROLS:**

- green algae  
(Chlorella pyrenoidosa)
- blue green algae  
(Phormidium inusturum)
- mustard algae  
(Pseudochloris meringensia)
- black algae  
(Phormidium luridum)

EPA REG. NO. 71537-1  
EPA EST. NO. 71537-MI-001  
Manufactured by Clear Source One, LLC  
Grand Rapids, Michigan 49504

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner that is inconsistent with its labeling. This product is recommended for use in pools with capacities of at least 2,000 gallons and equipped with filtration systems.

**FOR USE IN POOLS  
INITIAL TREATMENT**

- Before adding C-Pool Natural Balance clean and shock-treat pool water with Chlorine or Bromine to 3 PPM.
- Balance water alkalinity. Total alkalinity should read between 80-150 PPM. Adjust pH to read between 7.2-7.6.
- As a minimum dose, add 2 ounces of C-Pool Natural Balance, per 1,000 gallons of pool water, which will result in a minimum concentration of 0.5 PPM Copper. If visible algae are present, increase the dose to 3 oz. Per 1,000 gallons of pool water (0.75 PPM copper). The maximum dose of C-Pool Natural Balance to be used is 5 ounces per 1,000 gallons of pool water, which will result in a Copper reading of 1.2 PPM. Swimmers may re-enter the pool with any Copper reading up to 1.2 PPM.
- Distribute C-Pool Natural Balance by sprinkling across pool water surface, every 3 to 4 feet around the perimeter of the pool, avoiding vinyl stairs.
- Vacuum the next day. After vacuuming, run the filter system for 48 hours, backwashing filter every 12 hours during the 48-hour period. Vacuum again if necessary. Thereafter, the pool pump running time may be reduced to 4-6 hours per day depending on water condition. During days of high air temperatures and heavy pool use, you may need to increase use of Chlorine or Bromine in daily treatments.

**WEEKLY MAINTENANCE**

As a minimum maintenance dose, add 1/8 ounce of C-Pool Natural Balance per 1,000 gallons of pool water (an additional 0.03 PPM) to maintain a minimum reading of 0.5 PPM Copper. This amount will normally be sufficient, depending on water loss from backwashing the filter, etc. If algae are present or as a maximum maintenance dose, add 1 oz. C-Pool Natural Balance per 1,000 gallons of pool water (an additional 0.25 PPM). Check Copper reading. Use readily available test kit to ensure copper levels are maintained. Do not exceed 1.2 PPM Copper. [redacted] using a Brominator or Chlorinator, fill it 1/2 full and place it on lowest setting.

**SUGGESTED TREATMENT EACH WEEK** (all treatments equal to 1 ppm C-Pool Natural Balance (0.03ppm copper))

8,000 gallons	1 oz.	1/2 scoop	32,000 gallons	4 oz.	2 scoops
16,000 gallons	2 oz.	1 scoop	40,000 gallons	5 oz.	2-1/2 scoops
24,000 gallons	3 oz.	1-1/2 scoops	48,000 gallons	6 oz.	3 scoops

**FOR YEAR-ROUND USE**

For pools open all year round, follow Weekly Maintenance directions. In addition, follow directions for Initial Treatment twice per year. Check copper reading every 3 months to maintain 0.7-1.2 PPM.

Note: When having pool water tested or analyzed, a copper reading of 0.7-1.2 PPM is appropriate and should be maintained. This product does not act as a bleaching agent on stains such as Chlorine burns, earthworms, leaf stains or areas damaged by use of abrasive cleaners on liner surface. Stains may occur due to excessive levels of Iron or Copper salts. Pre-treating pool water with a heavy metal sequestering product will reduce the risk of stains.

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans and Domestic Animals**

**WARNING:** Causes substantial, but temporary eye injury. Do not get in eyes or on clothing. Wear safety glasses. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before wearing.

**FIRST AID**

<b>IF IN EYES</b>	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
<b>IF ON SKIN OR CLOTHING</b>	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for further treatment advice.
<b>IF INHALED</b>	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
<b>IF SWALLOWED</b>	• Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
<b>NOTE TO PHYSICIAN:</b> Probable mucosal damage may contraindicate gastric lavage.	

**ENVIRONMENTAL HAZARDS**

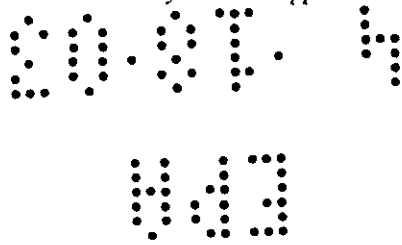
This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of the National Pollutant Discharge Elimination Systems (NPDES) permit; and the permitting authority has been notified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

**STORAGE AND DISPOSAL**

**STORAGE:** Keep container closed when not in use. Leaking or damaged containers should be placed in a plastic bag and discarded in trash. All pesticides should be kept out of reach of children and stored away from food.

**DISPOSAL:** Do not re-use empty container. Rinse empty container thoroughly with water to dissolve all material before discarding. Securely wrap in several layers of newspaper and discard in trash.

Administrative Note: Any text that appears between brackets [ ] is optional and may or may not appear on final printed labeling.



ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

JUL 15 2003

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

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Handwritten initials: W, R, W