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



SEPA United States Protection Office of Pesticide Programs Agency

October 8, 2008

Bonnie J. Bieber E.I. du Pont de Nemours and Company P.O. Box 80402 DuPont Experimental Station, E402/3224D Wilmington, DE 19880-0402

Subject:

CDRW-D5

EPA Registration No. 71654-9 Application Date: July 14, 2008 Receipt Date: July 16, 2008

Dear Ms. Bieber:

The Agency determined that the request to add "Salt Water Generator Pools" to the proposed label could only be accomplished by amendment on March 7, 2008.

The following amendment submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is accepted with a condition.

Condition

The Precautionary Statements should state:

"Corrosive. Causes irreversible eye damage and skin irritation. Harmful if swallowed or inhaled. Do get in eyes, on skin, or, on clothing. Avoid breathing dust, vapor, or, spray mist. Wear protective eyewear such as goggles, face shield or safety glasses. Wear protective clothing and chemical-resistant gloves. When mixing and loading, wear a chemical-resistant apron. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals."

General Comments

A stamped copy of the labeling accepted with a condition is enclosed. Submit one copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Wanda Henson at (703) 308-6345.

Sincerely,

Emily H. Mitchell

Product Manager – Team 32 Regulatory Management Branch II Antimicrobials Division (7510P)

FRONT PANEL

CDRW-D5

(Multi-functional low chlorine oxidizer for weekly treatment)

ACTIVE INGREDIENT:

Potassium monopersulfate compound: Chlorine-free [shock-] oxidizer [to reduce organic contaminants]), sodium carbonate: buffer [to prevent changes in pool water pH], and diallyl dimethyl ammonium chloride: polymeric clarifier [to aid filtration of suspended particles]

AVAILABLE CHLORINE:

9.53%

KEEP OUT OF REACH OF CHILDREN DANGER

FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

If in Eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present after 5 minutes, then continue rinsing eye.
- Call a Poison Control Center or doctor for further treatment advice.

If on Skin or Clothing:

- 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.

If Swallowed:

- 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.

If Inhaled:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a Poison Control Center or doctor for further treatment advice

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

MANUFACTURED BY:

E.I. du Pont de Nemours and Company 1007 Market Street Wilmington, DE 19898 Questions? Call 1-800-441-7515 ACCEPTED with COMMENTS EPA Letter Dated:

EPA Reg. # 71654-9 EPA Est. # 42291-GA-1

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 71654

Net Contents :xxxx GCP-21613 042307 REV071408

PRECAUTIONARY STATEMENTS

CDRWD5 1 07/14/08

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

DANGER. Corrosive. Causes irreversible eye damage and skin irritation. Harmful if swallowed or inhaled. Do not get in eyes, on skin or on clothing. Avoid breathing dust, vapor, or spray mists. Wear protective eyewear such as goggles, face shield or safety glasses. Wear protective clothing and chemical resistant gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

ENVIRONMENTAL HAZARD: This product is toxic to fish and aquatic organisms.

Additional env hazard language for product packaged in >50 lb containers

[Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other 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 local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.]

PHYSICAL OR CHEMICAL HAZARDS:

Contains oxidizing agents. Do not mix with other chemicals or any other substance. Do not predissolve or add water to this product. Always apply product directly into the pool or spa. Contamination of this product with moisture or small amounts of water, other chemicals, organic matter or other substances, can lead to product decomposition with generation of heat, liberation of hazardous gases, and potentially fire and explosion. In case of contamination or decomposition, do not reseal container. Isolate container outdoors in open air, and flood with large amounts of water.

CDRW-D5 is a proprietary blend of DuPont Oxone®, a powerful oxygen based oxidizer, and a chlorinating agent, combined with a pH buffer and a dry clarifier. This unique formulation provides the benefits of oxygen-based oxidation, while boosting free chlorine concentrations. This one-two punch keeps water sparkling clear, by oxidizing and eliminating organic contaminants. Since CDRW-D5 is buffered, it will not affect water balance; therefore pH and total alkalinity will remain unchanged. The addition of dry clarifier aids the oxidation/filtration process so water contaminants are more readily removed by routine filtration. CDRW-D5 is specially formulated to prevent dull, hazy water, [and when used in conjunction with an EPA registered sanitizer like chlorine or bromine, inhibit the growth of algae]. Add CDRW-D5 to [pool water every week] [spa water after every use] to oxidize contaminants introduced by bathers, and to maintain sparkling clear [pool][spa] water.

DIRECTIONS FOR USE:

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

HOW TO APPLY:

For Pools:

Always add with pump and filter running to ensure complete mixing and good circulation. CDRW-D5 is completely soluble and dissolves quickly, so no mixing is required. Broadcast CDRW-D5 uniformly over the surface of the water, [adding about two thirds of the total dose.]

into the deep end of the pool]. Apply product when swimming pool is not in use. Swimming may resume as soon as 15 minutes after product application, provided the chlorine residual concentration in the pool is between 1 and 3 ppm. Reentry is prohibited above levels of 3 ppm chlorine due to risk of bodily injury.

For pools with moderate daily use, add *CDRW-D5* weekly at a dose of 1 pound per 10,000 gallons of pool water. Each pound of *CDRW-D5* will raise the free chlorine concentration by 1 ppm (part per million) in 10,000 gallons of pool water. More frequent and/or heavier doses may be required during periods of heavy use or following heavy rains or high winds. [If an algae problem exists, add granular chlorine or an algicide according to label directions.]

For pool opening and pool closing applications, add *CDRW-D5* at a dose of 2 pounds per 10,000 gallons of pool water. This dose will provide sufficient oxidizer to eliminate most of the contaminants that accumulate in pool water, and will immediately raise the free chlorine concentration by 2 ppm (parts per million) in 10,000 gallons of pool water.

[For Pools Using a Salt Water Chlorine Generator:

Add CDRW-D5 weekly at a dose of 1 pound per 10,000 gallons of water. Each pound of CDRW-D5 will rapidly raise the the free chlorine concentration by 3 ppm (parts per million) in 10,000 gallons of pool water.]

For Spas:

Always add *CDRW-D5* with pump and filter operating to ensure complete mixing and good circulation. *CDRW-D5* is completely soluble and dissolves quickly, so no mixing is required. Broadcast *CDRW-D5* uniformly over the surface of the spa water. Apply when spa is not in use.

For most spas with normal bathing loads, CDRW-D5 should be added after every use, and once each week for maintenance, at a dose of $1-1\frac{1}{2}$ ounce per 300 gallons of spa water. Each 1 ounce dose of CDRW-D5 will raise the free chlorine concentration by about 2 ppm (part per million) in 300 gallons of spa water. More frequent and/or heavier doses may be required during periods of extremely heavy use. Test chlorine level prior to re-entry to make sure the residual concentration in the spa is between 1 and 3 ppm. Reentry is prohibited above levels of 3 ppm chlorine due to risk of bodily injury.

Note: When used in conjunction with bromine sanitizers, *CDRW-D5* will regenerate active bromine by oxidizing inert bromide salt to active bromine sanitizer. Both chlorine and bromine will be present for a short period of time. Test bromine level prior to re-entry to make sure the residual concentration in the spa is between 1 and 4 ppm.

STORAGE AND DISPOSAL

[for product sold in unit pack bags]

STORAGE AND DISPOSAL: Keep this product dry, in its original unopened bag until use. Store in a cool, dry, well-ventilated area, away from combustible materials, incompatible chemicals and sources of heat. Moisture may decompose this product and cause a violent reaction leading to fire and explosion. In case of decomposition, isolate bag in open area if possible and flood area with large amounts of water to dissolve all material before discarding this bag. Do not contaminate food or feed by storage or disposal.

CONTAINER DISPOSAL: Rinse empty bag thoroughly. Do not reuse bag. Discard in trash.

for product sold in plastic bottles or pails]

STORAGE AND DISPOSAL: Keep this product dry, in its original tightly closed container when not in use. Store in a cool, dry, well-ventilated area, away from combustible materials, incompatible chemicals and sources of heat. Moisture may decompose this product and cause a violent reaction leading to fire and explosion. In case of decomposition, isolate container in open area if possible and flood area with large amounts of water to dissolve all material before discarding this container. Do not contaminate food or feed by storage or disposal.

CONTAINER DISPOSAL: Rinse empty container thoroughly. Do not reuse container. Discard in trash.

WARRANTY STATEMENT

[Limited Warranty: If not satisfied with this product's performance when used specifically as directed, contact DuPont for a refund of purchase price or product replacement with proof of purchase. THE COMPANY MAKES NO WARRANTY, EXPRESS OR IMPLIED, EXCEPT SUCH AS IS EXPRESSLY SET FORTH HEREIN. The Company's liability for any breach of warranty shall be limited to the purchase price of the product. The Company shall not be liable for any incidental or consequential damages for any breach of warranty. Some States do not allow the exclusion or limitation of incidental or consequential damages, so the above limitation or exclusion may not apply to you. This warranty gives you specific legal rights, and you may also have other rights which vary from State to State]

[Limited Warranty: If product fails to perform in accordance with label claims, when used specifically as directed, contact DuPont for a refund of purchase price or product replacement with proof of purchase. THE COMPANY MAKES NO WARRANTY, EXPRESS OR IMPLIED, EXCEPT SUCH AS IS EXPRESSLY SET FORTH HEREIN. The Company's liability for any breach of warranty shall be limited to the purchase price of the product. The Company shall not be liable for any incidental or consequential damages for any breach of warranty. Some States do not allow the exclusion or limitation of incidental or consequential damages, so the above limitation or exclusion may not apply to you. This warranty gives you specific legal rights, and you may also have other rights which vary from State to State)

CDRW-D5 Master Product Label

(Multi-functional low chlorine oxidizer for weekly treatment)

All text in brackets [xxx] is optional and may or may not be included on final label.

All italicized text is administrative and will not appear of final label.

Optional marketing statements that may be used with [swimming pool] [spa] shock treatment and oxidizer applications:

[Contains [72%] [DuPont] Oxone®" [from DuPont]]

[Contains [72%] Oxone® for added oxidizing power]

[For use in vinyl, plaster, painted or fiberglass surface pools]

[For use on all [pool] [spa] types]

[For use on all [pool] [spa] surfaces]

[Ideal for vinyl pools]

[Ideal for plaster pools]

[Ideal for all [pool] [spa] types]

[Ideal for all [pool] [spa] surfaces]

[Ideal for [pool] [spa] start-ups]

[Ideal for pool closings]

[Ideal for winterizing treatments]

[Effective winter shock treatment]

[Quick dissolving]

[Multi-functional oxidizer]

[Multi-functional low chlorine oxidizer]

[Multi-functional [pool] [spa] shock]

[Multi-functional low chlorine [pool] [spa] shock]

[Multi-functional shock treatment]

[Multi-functional low chlorine shock treatment]

[Multi-purpose shock and oxidizer]

[Multi-purpose low chlorine shock and oxidizer]

[Multi-oxidizer shock treatment]

[For swimming pools and spas]

[Fast acting]

[Establishes immediate chlorine residual]

[Boosts chlorine residual]

[Boost bromine residuals in bromine treated spas]

[Restores water clarity] [Controls]

[Add weekly for sparkling clarity]

[Part of a] weekly care program]

[Clears cloudy water]

[[Oxidizes] [Eliminates] [Controls] contaminants that cause cloudy water]

[[Oxidizes] [Eliminates] [Controls] organic contaminants]

[[Oxidizes] [Eliminates] [Controls] organic waste]

[[Oxidizes] [Eliminates] [Controls] swimmer contaminants]

[[Prevents][Controls] algae]

[Contains Oxone® oxygen-based oxidizer]

[Contains Oxone® only by DuPontTM]

[Contains DuPontTM Oxone®]]

[Combines the benefits of Oxone® with chlorine residual protection]

[The combined power of Oxone® and chlorine]

[Combines the power of Oxone® with low levels of chlorine]

[Shock and oxidizer]

[Shock, oxidizer, buffer and clarifier]

[Eliminates chloramine odors]

[Reduces chloramines]

[Reduces chloramines which can cause irritation]

[Shock and swim in 15 minutes]

[Same day shock and swim]

[Anytime shock]

[Ideal for bromine treated spas]

[Ideal for spas with mineral systems]

[Specifically Formulated for Salt [Water Generator] Pools]

[Excellent for Salt [Water Generator] Pools]

[Weekly Shock Treatment for Salt [Water Generator] Pools]

[Boosts Chlorine level in Salt [Water Generator] Pools]