

71654-10

02/27/2007

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

February 27, 2007

Nancy B. Lomax
Dupont Chemical Solutions Enterprises
P.O. Box 80402
Wilmington, DE. 19880-0402

Subject: CDRW-D1
EPA Registration Number 71654-10
Application Date: December 12, 2006

Dear Ms. Lomax:

The Agency has reviewed the application for amendment you have submitted in accordance with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). In summary, the alternate Confidential Statement of Formula (CSF) is acceptable. The label revisions you proposed on your master label are acceptable with the following exceptions

- Change "kill bacteria" to "control bacteria" on page 3. A "kill" claim is for disinfectants not sanitizers.
- Change "kills bacteria" to "controls bacteria" on page 7.
- Delete the 2 lines on page 7 that claim to kill bacteria.

Enclosed is a copy of our review, D335271, and your conditionally accepted label. Should you have any questions or comments concerning this letter, please contact Tom Luminello at (703) 308-8075.

Sincerely,

A handwritten signature in cursive script that reads "Emily H. Mitchell".

Emily H. Mitchell
Product Manager 32
Regulatory Management Branch II
Antimicrobials Division (7510 P)

HIGHLIGHTED COPY

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MASTER LABEL

CDRW-D1

[Shock] [Oxidizer] [Algaecide] [Algicide] [Sanitizer]

ACTIVE INGREDIENT:

Sodium dichloro-s-triazinetriene 45%

OTHER INGREDIENTS..... 55%

TOTAL 100%

AVAILABLE CHLORINE 28%

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 FOR:
E.I. du Pont de Nemours and Company
1007 Market Street
Wilmington, DE 19898
Questions? Call 1-800-441-7515

EPA Reg. # 71654-10
EPA Est. # XXXXXXXX
Net Contents : XXX (see container label)
GCP-21612 082905 rev121106

CDRW- D1

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WITH COMMENTS
In EPA Letter Dated.

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PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS:**

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

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 pre-dissolve 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-D1* 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, and helps ensure sanitizer residuals are maintained.] [The addition of a dry clarifier aids the oxidation/filtration process so water contaminants are more readily removed by routine filtration.] [*CDRW-D1* is specially formulated to prevent dull, hazy water, [sanitize the water] and inhibit the growth of algae.] *CDRW-D1* can be used as a [swimming pool] [spa] sanitizer, or as a weekly shock treatment and oxidizer [or as an algaecide]. For shock treatment and preventive oxidation, add *CDRW-D1* to [pool] [spa] water every week to produce sparkling clear[, algae free] water. For sanitation, follow label directions below.

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DIRECTIONS FOR USE:

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

HOW TO APPLY:

[Note to Reviewer: Package label will show either swimming pool use directions, spa use directions, or both. The TREATMENT OF VISIBLE ALGAE and ADDITIONAL APPLICATIONS are optional sections for swimming pool labels]

For Swimming Pools:

Always add with pump and filter running to ensure complete mixing and good circulation. [CDRW-D1 is completely soluble and dissolves quickly, so no pre-mixing is required.] Apply product when swimming pool is not in use. Test chlorine level prior to re-entry to make sure the 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.

[[WHEN USED] FOR WEEKLY [SHOCK] [OXIDIZER] TREATMENT IN CONJUNCTION WITH A PRIMARY SANITIZER:

For pools with moderate daily use, add CDRW-D1 weekly at a dose of 1 pound per 10,000 gallons of pool water. Each pound of CDRW-D1 will raise the free chlorine concentration by 3 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.]

WHEN USED AS THE PRIMARY SANITIZER [(to ^{Control} kill Bacteria and Germs)]:

1. For best results, adjust alkalinity to between 100 and 150 ppm, and adjust pH to between 7.2 and 7.8.
2. Add an initial dose of stabilizer, as directed on the stabilizer product label, to establish a starting concentration of 30-40 ppm. [Regular use of CDRW-D1 will supply additional stabilizer.]
3. For effective sanitation, chlorine sanitizer residuals must be maintained between 1-3 ppm at all times, in all areas of the pool. Add an initial dose of 1 pound of CDRW-D1 per 10,000 gallons of water to establish a free chlorine sanitizer residual of 3 ppm. [For initial treatment of small pools use the table below. This dose will deliver 3 ppm of free chlorine to pool water]

[Note to reviewer: The package label will specify the dose in either ounces or number of pouches, depending on the form of the product packaging]

Pool size in gallons	Ounces of CDRW-D1 to add	Number of 2 oz pouches of CDRW-D1 to add
1250	2 ounces	1
2500	4 ounces	2
5000	8 ounces	4
10000	16 ounces	8]

]

4. Pool water must be tested regularly to ensure free chlorine residuals are maintained between 1-3ppm at all times in all areas of the pool. CDRW-D1 must

be added daily or every other day to maintain the chlorine residual in the desired range. 2½ ounces of *CDRW-D1* per 10,000 gallons will raise free chlorine residuals by 0.5 ppm. Do not let chlorine residuals drop below 1 ppm.

5. [If pH is less than 7.2 add [DuPont Pool Care] pH Increaser per label directions]
6. [If pH is greater than 7.8 add [DuPont Pool Care] pH Decreaser per label directions.]

[TREATMENT OF VISIBLE ALGAE

1. Remove as much algae as possible by brushing and vacuuming debris to waste.
2. Backwash filter
3. Apply 3 pounds of *CDRW-D1* per 10,000 gallons of pool water
4. Brush entire pool daily for three consecutive days and vacuum debris to waste
5. Re-test the water for free chlorine using a reliable test kit. Swimming may resume when the chlorine concentration is 3 ppm or less.]

[ADDITIONAL APPLICATIONS:

For pool opening and pool closing applications, add *CDRW-D1* 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 6 ppm (parts per million) in 10,000 gallons of pool water.]

For Spas:

Always add with pump and filter running to ensure complete mixing and good circulation. [*CDRW-D1* is completely soluble and dissolves quickly, so no mixing is required.] Broadcast *CDRW-D1* uniformly over the surface of the water. Always apply product when spa is not in use. Test chlorine level prior to reentry 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

SPA AND HOT TUB SANITIZER:

1. For best results, adjust alkalinity according to directions of alkalinity package. [If using a borate buffer [such as DuPont Spa Care pH Stabilizer] add 2 pounds per 300 gallons] [If using a carbonate buffer adjust alkalinity to between 80 and 150ppm]
2. Adjust pH to between 7.2 and 7.8
3. When *CDRW-D1* is used as a primary [spa] [hot tub] sanitizer, add an initial dose of ½ ounce per 300 gallons of water to establish a free chlorine residual between 1-3 ppm. Circulate spa water for five to ten minutes to allow for complete mixing and good circulation prior to testing.
3. Test spa water for free chlorine. Once the chlorine residual is 1-3 ppm, the [spa] [hot] tub may be entered. Reentry is prohibited above levels of 3 ppm chlorine due to risk of bodily injury.
4. [Spa][Hot tub] water must be tested regularly to ensure that a free chlorine residual is maintained between 1-3 ppm at all times. *CDRW-D1* should be added as necessary to maintain 1-3 ppm residual chlorine. One-half ounce (1 tablespoon) of *CDRW-D1* per 300 gallons will raise free chlorine residual by 3 ppm. Do not let chlorine residual drop below 1 ppm.

5. [Contaminants are introduced when the [spa] [hot tub] is used.] [Always] add ½ ounce per 300 gallons after using the [spa] [hot tub] to oxidize contaminants and to re-establish the chlorine sanitizer residual.

[SHOCK TREATMENT]-[PREVENTIVE OXIDATION]:

For residential spas, *CDRW-D1* should be added after every use at a dose of ½ ounce per 300 gallons of spa water, AND once per week at a dose of 1 ounces per 300 gallons of spa water. Heavily used spas may require shock treatment on a daily basis.

Reentry into the treated spa or hot tub can resume after the free chlorine concentration has dropped to 1-3 ppm. Reentry is prohibited above levels of 3 ppm chlorine due to risk of bodily injury

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.

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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]

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CDRW-D1**(Shock, Oxidizer, Algicide, Sanitizer)**

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 biocidal claims that may be used with [swimming pool] [spa] sanitation and algae control:

[Swimming pool and spa sanitizer]

[Swimming pool sanitizer]

[[Above] [On] ground [swimming] pool sanitizer]

[Kiddie pool sanitizer]

[For daily sanitation and algae control]

~~[Kills bacteria and germs]~~

[Multi-functional sanitizer and oxidizer [for [above ground] [on ground] [swimming pools] [spas] [hot tubs]]]

[Spa and hot tub sanitizer]

[Sanitizer, shock, and oxidizer]

[Sanitizes, shocks, and oxidizes pool and spa water]

~~[Kills and controls algae and bacteria]~~

[Kills and controls algae]

[Prevents algae and bacteria growth]

[Prevents the growth of algae and bacteria]

[Inhibits algae growth]

[Inhibits the growth of algae]

[Controls algae growth]

[Controls the growth of algae]

[Bacteria control]

[Controls bacteria]

[Establishes immediate chlorine residual]

[Boosts chlorine residual, by adding 3 ppm free chlorine]

[Boosts sanitizer residual, by adding 3 ppm free chlorine][Improves sanitizer efficiency]

[Boosts bromine residuals in bromine treated [pools][spas]

[Sanitizer support]

~~[Kills bacteria and algae]~~

[Sanitizes, oxidizes, clarifies and kills algae]

[4 in 1 treatment for [small] pools]

[4 in 1 treatment for spas]

[Maintain chlorine residuals]

[Sanitizer, Shock, Oxidizer and Clarifier]

[Swim in 15 minutes after treatment]

[3 in 1 treatment for [small] pools]

[3 in 1 treatment for spas]

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

- [For use in vinyl, plaster, painted or fiberglass surface pools]
- [For use in all pool types]
- [Compatible with all pool surfaces]
- [Ideal for vinyl pools]
- [Ideal for plaster pools]
- [Ideal for all pool types]
- [Ideal for all pool surfaces]
- [Ideal for pool 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]
- [For swimming pools and spas]
- [Fast acting]
- [Restores water clarity]
- [Produces clear, sparkling water]
- [Clears cloudy water]
- [Contaminant control]
- [[Oxidizes] [Eliminates] [Controls] contaminants that cause cloudy water]
- [[Oxidizes] [Eliminates] [Controls] organic contaminants]
- [[Oxidizes] [Eliminates] [Controls] organic waste]
- [[Oxidizes] [Eliminates] [Controls] swimmer contaminants]
- [Contains Oxone® oxygen-based oxidizer]
- [Multi-oxidizer shock treatment]
- [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]
- [Shock and swim in 15 minutes]
- [Same day shock and swim]
- [Anytime shock]
- [Boost bromine residuals in bromine treated [pools] [spas]]
- [Ideal for bromine treated spas]
- [Ideal for spas with mineral systems]

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