



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

NOV - 8 1999

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Crystalline H₂O
c/o Kim Davis, Agent
Reg West Company
P.O. Box 2220
Greeley, CO. 80632-2220

SUBJECT: August 12, 1999 label amendment
Crystalline H₂O
EPA Registration 71686-1

Dear Ms. Davis:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below.

1). On page one, the front panel of the label, the phrase *and Reduces Chlorine Disinfectants [Usage]* must be deleted.

2). On the top of page 2, item # 4 must be deleted. It is not clear that your product reduces the need for a chlorine disinfectant. The Agency would need to complete a full analysis of comparative data completed under DIS/TIS 12 before such a claim can be accepted. On page 2 under the table, the phrase *and do not add other products except for granulated chlorine* must be changed to *with an EPA registered chlorine product*.

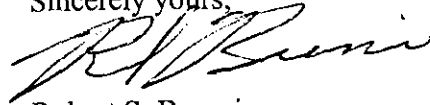
3). We have deleted page 3 of the proposed label which is additional verbiage intended as advertising copy and that portion of page 2 after Physical or Chemical Hazards. We are concerned that the need to use this product with another for proper disinfection might be buried under this optional language. The procedure for proper swimming pool water treatment requires that directions for the chlorine product are followed independent of your product's labeling.

Two copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy is enclosed for your records.

0 7 8
4

If you have any questions regarding this letter, please contact Tom Luminello of my staff at (703) 308-8075.

Sincerely yours,



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

Attachment

)

374
2R

CRYSTALLINE H₂O™

GRANULAR ALGAECIDE

Controls Algae in Swimming Pool Water * [NEW] for Swimming Pools

Chlorine Reducer * Clarifies Water * Stabilizes the pH

Controls Algae While At the Same Time Stabilizes the Water's pH Level,
Clarifies Water ~~and Reduces Chlorine Disinfectants [Usage]~~

ACTIVE INGREDIENT:

*Copper sulfate 20.0%

OTHER INGREDIENTS 80.0%

*Equivalent to 5.0% copper as elemental Total 100.0%

delete
[Handwritten scribbles]

**Keep Out of Reach of Children
CAUTION
See back panel for additional precautionary statements.**

EPA Reg. No. 71686-1

EPA Est. 71686-CAN-1

NET CONTENTS: 10.6 oz. (300 g.)

Crystalline H₂O

P.O. Box 351

Station St. Martin H7V 3P6

Made in Canada

Developed by Technitol•Eco Laboratories

Patent Pending

ACCEPTED
with COMMENTS
in EPA Letter Dated:

NOV - 8 1999

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

[Back Panel]

71686-1

DIRECTIONS FOR USE

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

Crystalline H₂O is an efficient chlorine reducer, pH stabilizer, effective algaecide and water clarifier for the maintenance of swimming pool water quality.

Crystalline H₂O is very easy to use. For spring startup, mix 1 to 2 cups of granulated chlorine in one gallon of hot water and pour into your pool. This will enable the chlorine to dissolve faster. As the water clears, it is very important to do your backwash every 6 hours, until the water is clear. You should also vacuum your pool to remove any leaves and solid residue. Forty-eight (48) hours later, pour the suggested weekly quantity of Crystalline H₂O in the skimmer. If the water is cloudy, double this quantity. Once the water is clear, start using Crystalline H₂O as instructed below.

1. For best results, maintain the recommended pH, total alkalinity, calcium hardness, chlorine and copper levels correctly balanced. Monitor these key water parameters using an adequate test kit.
2. Initial dosage for pool water having visible algae or cloudy water is double the recommended weekly dose.
3. Weekly maintenance usage of Crystalline H₂O will maintain the optimal concentration of copper in treated water (around 0.5 to 1.0 ppm or mg/l) while maintaining the pool pH between 7.0 and 8.5.

494
2 (12)

ACCEPTED
with COMMENTS
in EPA Letter Direct

NOV - 8 1999

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

71686-1

- 4. ~~Add chlorine to maintain your chlorine concentration at or above 0.6 ppm.~~ delete
- 5. If the pH rises above the suggested level, simply reduce the weekly dose of Crystalline H₂O.

Pour the required quantity of Crystalline H₂O directly into the skimmer.

WEEKLY SUGGESTED QUANTITY
(After the Backwash)

POOL SIZE AND APPROXIMATE VOLUME									
ROUND					RECTANGULAR (average depth 5')				
Diameter (Feet)	Volume		Quantity of Crystalline H ₂ O		Dimensions (Feet)	Volume		Quantity of Crystalline H ₂ O	
	Gallons	Liters	Ounces	cc or ml		Gallons	Liters	Ounces	cc or ml
15	5,300	20,000	0.2	6	15 x 30	16,800	63,600	0.7	19
18	7,500	28,600	0.3	8	16 x 32	19,200	72,700	0.8	22
21	10,300	39,000	0.4	12	18 x 36	24,300	92,000	1.0	28
24	13,700	51,800	0.5	15	Note: To ease calculations, use 1 ounce (3 to 3.5 ml or cc) of product per 2,600 gallons (10,000 liters) of pool water.				
27	17,100	64,800	0.7	19					

Use the measuring cup included with this product.

Crystalline H₂O to be effective, use as directed and ~~do not add other products, except for granulated chlorine.~~ To avoid reducing the efficiency of Crystalline H₂O, do not touch product with wet hands.

change to :
with AN EPA registered chlorine product

Storage and Disposal

Storage: Store in a dry place, preferably out of reach of children and pets. **Disposal:** Do not reuse empty container; wrap and put in trash.

PRECAUTIONARY STATEMENTS
Hazards to Humans & Domestic Animals

CAUTION: Harmful if swallowed. Avoid contact with skin and eyes. Wash thoroughly with soap and water after handling.

First Aid

If Swallowed: Call a physician or poison control center. Drink 1 to 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 In Eyes:** Flush eyes with plenty of water. Call a physician if irritation persists. **If On Skin:** Wash with plenty of soap and water. Get medical attention if irritation persists. **If Inhaled:** Remove person to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

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 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

Excessive levels of copper will increase the possibility of stain on the pool surface caused by copper salts deposition. This should not occur when using Crystalline H₂O at labeled rates.

[Additional verbiage to be used as selling copy alone or in brochures:]

Clear water in your swimming pool... The Secret
In most cases, Crystalline H₂O™ with a little Chlorine* added will replace all the products used for your pool maintenance. Crystalline H₂O reduces both the use of chlorine* and pool-maintenance time to a minimum. Clarifies water. Stabilizes the pH. Controls algae in swimming pool water (granular algicide).

not acceptable