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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

DEC 23 2002

John Harvey, Agent
Crystalline H₂O Inc.
562 Windrift Street
Spring Lake, MI. 49456

SUBJECT: November 6, 2002 amendment
Crystalline Pool System
EPA Registration 71686-1

Dear Mr. Henry:

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

On page 2 change the second sentence of Step 1 by adding "according to that product's instructions" after shock (superchlorinate) water.

On page 3 under Precautionary Statements change the appearance of the signal word Caution by making all capital letters and in bold type i.e. **CAUTION**.

On page 3, modify the Environmental Hazards statement by deleting all but the first sentence. The National Pollutant Discharge Elimination System statement is not required for a product under 5 gallons or 50 pounds. Concurrently, you must submit Child-Resistant Packaging Certification as required by 40 CFR§157.20.

Two copies of the finished labeling must be submitted prior to releasing the re-labeled product for shipment. An acceptable copy of an edited label is enclosed. If you have any questions regarding this letter, please contact Tom Luminello of my staff at (703) 308-8075.

Sincerely yours,

fa
Handwritten signature of Robert S. Brennis in cursive.

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

Enclosure

GRANULAR ALGICIDE

CONTROLS ALGAE
in swimming pool water

CLARIFIES WATER

STABILIZES the pH

For CRYSTALLINE H₂O SYSTEM to be effective
you should respect the suggested dosing quantity and
not add other products except for granulated chlorine

EPA Reg. No. 71686-1 EPA Est. 71686-CAN-1

CRYSTALLINE



Net contents:
10.6 OZ. (300 g)

CHLORINE REDUCER

ACTIVE INGREDIENT:

Copper sulfate	20.0%
OTHER INGREDIENTS	80.0%
Equivalent to 3.0 copper as a gramme Total	100.0%

Keep out of reach of children
CAUTION
See package insert for additional
precautionary statements

DIRECTIONS FOR USE

It is a violation of Federal law to use this product
in a manner inconsistent with its labeling.
Refer to package insert for complete Directions.

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.

CRYSTALLINE H₂O inc
P.O. Box 351, Station St-Martin
Laval (Qc), Canada H7V 3P6
1-888-478-4430 © 2002 CRYSTALLINE H₂O inc

ACCEPTED
WITH COMMENTS
in EPA Letter Label

DEC 23 2002

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Crystalline Pool System™

Directions for use

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

Crystalline Pool System™ is an efficient chlorine reducer, pH stabilizer, effective algacide and water clarifier for the maintenance of swimming pool water quality.

Crystalline Pool System™ is very easy to use.

according to product's instructions

Step 1: Make sure that the filtration system is in good working order. If water or pool are not clean, shock (superchlorinate) water and vacuum the pool to remove any leaves and solid residues. Backwash all waste from filter.

Step 2: With an adequate test kit, check water characteristics. Total alkalinity level must be between 80 and 120 ppm and pH between 7.2 and 7.8. Calcium hardness should be between 150 and 500 ppm. Those key parameters should be adjusted to those levels if needed.

Step 3: Once the water is clear and balanced, use the enclosed measuring cup to pour the suggested weekly quantity of *Crystalline Pool System™* into the skimmer. An equal quantity should be diluted in a pail of hot water and spread evenly around the pool, at first application only.

Step 4: Chlorine concentration should be kept at 1.5 ppm during the first week. Add enough chlorine regularly to maintain chlorine concentration at 0.6 ppm thereafter.

note 1: *Crystalline Pool System™* must always be applied after a backwash, never before.

note 2: 48 hrs. prior to start using *Crystalline Pool System™*, make sure not to use any other product except for chlorine.

note 3: Monitor key water parameters every 2 to 3 weeks and adjust to above-mentioned standards if necessary. The addition of large amounts of new unbalanced water will alter water parameters.

WEEKLY SUGGESTED QUANTITY

(after the backwash)

Pool size and approximate volume

Round Diameter (feet)	Quantity of <i>Crystalline Pool System™</i>				Quantity of <i>Crystalline Pool System™</i>				
	Volume Gallons	Volume Liters	Ounces	cc or ml	Rectangular (avg. depth 5') Dimensions (feet)	Volume Gallons	Volume Liters	Ounces	cc or ml
15	5,300	20,000	0.2	7	15 x 30	16,800	63,600	0.7	22
18	7,500	28,600	0.3	10	16 x 32	19,200	72,700	0.8	25
21	10,300	39,000	0.4	14	18 x 36	24,300	92,000	1.0	32
24	13,700	51,800	0.5	18					
27	17,100	64,800	0.7	23					

use the measuring cup included with this product

Note: to ease calculations, use 1 to 1.2 ounce of product per 2,600 gallons (4.0 ml or cc per 10,000 liters) of pool water.

Pour the required quantity of *Crystalline Pool System™* directly into the skimmer

For *Crystalline Pool System™* to be effective, you should respect the suggested weekly quantity and not add other products, except for chlorine and unless you must balance the water.

ACCEPTED WITH COMMENTS EPA Letter Dated:

DEC 23 2002

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