



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

May 31, 2016

Abigail T.D. Wacek
PoolRx
60 Post
Irvine, CA 92618

Subject: Notification per PRN 98-10 – Add Hot Tub and Optional Test Information
Product Name: PoolRX
EPA Registration Number: 79817-3
Application Date: May 17, 2016
Decision Number: 79817-3

Dear Ms. Wacek:

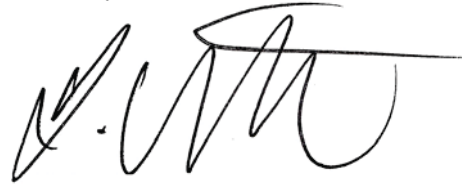
The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

If you have any questions, you may contact Terria Northern at 703-347-0265 or via email at northern.terria@epa.gov.

Sincerely,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the end.

for

Julie Chao, Acting Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510P)
Office of Pesticide Programs

{Administrative Notes: Bracketed text [] indicates optional text for different version of product label.
The terms "spa" and "hot tub" may be used interchangeably throughout the label.}

[PoolRx] [Product Name]

[Mineral Algaecide for [Residential and Commercial] [Swimming Pools] [and] Spas/Hot tubs]

Active Ingredient:
Copper Sulphate Pentahydrate (chelated)..... 52-.8%
Other Ingredients..... 47.2%
Total..... 100.0%

CAS #7758-99-8

Copper as metallic not less than 25%

NOTIFICATION

79817-3

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

05/31/2016

**KEEP OUT OF REACH OF CHILDREN
DANGER**

FIRST AID
IF SWALLOWED: Call a 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 a Poison Control Center or Doctor. Do not give anything by mouth to an unconscious person.
IF IN EYES: 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.
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate use of gastric lavage. Have product container or label with you when calling a Poison Control Center or doctor for treatment advice.
See [insert] [back/side panel] for additional precautionary statements [,] [directions for use] [and] [Quick Start Guide].

EPA Reg. No. 79817-3

NSF Cert No. C0055333

Net Weight: _____

EPA Est. No. 79817-CA-1

NSF Facility No. C0055334

Part No.: _____

[Manufactured [by] [for] [sold by] [distributed by] PoolRx

____Any Questions Please Call

60 Post

Irvine, CA 92618

1.800.376.6579 or

e-mail info@poolrx.com

[poolrx.com] [website]

PoolRx (79817-3)

PoolRx

Notification – May 17, 2016

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The terms “spa” and “hot tub” may be used interchangeably throughout the label. }

PRECAUTIONARY STATEMENTS

Hazards to humans and domestic animals.

DANGER: Corrosive. Causes irreversible eye damage Harmful if swallowed. Do not get in eyes or on clothing. Wear goggles, face shield, or safety glasses. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the restroom. Remove and decontaminate clothing before reuse.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish and aquatic invertebrates and may contaminate water through runoff. For terrestrial uses, do not apply directly to water. Do not contaminate water when disposing of equipment wash waters or rinsate.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed my storage or disposal.

PESTICIDE STORAGE: Keep Product in provided box and container until use. Keep product dry in tightly closed container when not in use and below 120°F - 50°C. Leaking or damaged containers should be placed in a plastic bag and discarded in trash.

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. Offer for recycling if available. Rinse thoroughly before recycling or discarding in trash.

PESTICIDE DISPOSAL: Pesticides wastes are acutely hazardous. Improper disposal of this pesticide is a violation of federal law. If this product cannot be used in accordance to labeling contact your state pesticide or environmental control Agency.

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The terms “spa” and “hot tub” may be used interchangeably throughout the label.}

[Note to reviewer: For large and small pools.]

Net weight: [0.72lbs(327 Grams)] [1.2 lbs (544 Grams)]

Treats [7.5k - 20k Gal] [20k - 30k Gal]

[PoolRx] [Product Name] contains a proprietary blend of minerals that continuously and effectively eliminate algae. The specially treated alloy cylinder is packed with [PoolRx] [Product Name] mineral formulation. These minerals immediately dissolve out of the cylinder and form a stable residual throughout the pool water for up to 6 months. The minerals eliminate the algae while freeing up low levels of chlorine to be more active and productive in the water. During the pools filtration process the minerals are rejuvenated every time they return and pass through the cylinder. [PoolRx] [Product Name] works synergistically with a constant low level of chlorine. Residential (0.5 - 1.0 ppm); Commercial (1.0 - 5.0 ppm)

Ideal for Salt Pools

[PoolRx] [Product Name] improves the saltwater experience. The minerals reduce the salt chlorine production needed to keep your salt pool algae free. Less salt chlorine production extends the life of the salt cell and reduces the amount of acid needed to balance the pH.

[PoolRx] [Product Name] prolongs the life of your equipment, saves you money, and improves the quality of your water.

DIRECTIONS FOR USE

It is a violation of federal law to use the product in a manner inconsistent with its labelling.

- Clean or backwash your filter before adding PoolRx.
- Place the [PoolRx] [Product Name] unit into Pump Basket or Skimmer. Ideally place in pump basket for increased water flow.
- The [PoolRx] [Product Name] unit should be added to the pool when the pump has at least 3 to 4 hours left on run cycle. This will ensure the minerals completely dissolve out of the unit and through the filter into the pool.
- Pump should run during the heat of the day.
- The pool should turn over its volume of water at least 1.5 times per day, this normally requires 6 to 8 hours per day this depends on gallons of your pool and pump flow rate.
- Do not re-clean or backwash filter for at least 2 weeks after [PoolRx] [Product Name] unit is installed so minerals can dissolve through the filter, whether it is a cartridge, D.E. or sand filter

Maintenance

[Maintain normal pool chemistry ranges] [Maintain normal chemistry]:

Residential Chlorine	0.5ppm – 1.0ppm
Commercial Chlorine	1.0ppm- 5.0ppm
pH	7.2-7.8
Alkalinity	80-120
Cyanuric Acid	10-80

Replace the [PoolRx] [Product Name] unit in basket every 12 months.

{ Administrative Notes: Bracketed text [] indicates optional text for different version of product label.
The terms “spa” and “hot tub” may be used interchangeably throughout the label. }

Add a [PoolRx] [Product Name] booster after 4-6 Months if needed. If you see algae coming back or the water looks a little dull you know it’s time to replace these lost minerals with the [PoolRx] [Product Name] booster (Part number 102001). In warmer climates or year round pool seasons, add the [PoolRx] [Product Name] booster minerals when needed or after 6 months. Start with a new [PoolRx] [Product Name] Unit at the beginning of each season.

Sizing

[PoolRx] [Product Name] mineral unit (blue unit; Part #101001) 7,500-20,000 gallons
Replacement minerals need to be added every 4-6 months (8oz of booster mineral; part #102001).

[PoolRx] [Product Name] mineral unit (black unit; Part #101066) 20,000-30,000 gallons
Replacement minerals need to be added every 4-6 months (2 x 8oz booster mineral; part #102001).

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[Note to reviewer: For boosters.]

Treats 7.5k to 20k Gal

Net Weight: 8 oz (227 grams)

[Bucket contains 20 boosters: 10 lbs (160 oz.) (4536 grams)]

The [PoolRx] [Product Name] booster contains the additional minerals needed to replace minerals that are lost through back wash, splash out and algae kill. [PoolRx] [Product Name] booster can also be used for larger pools that need additional minerals when initially installing a [PoolRx] [Product Name] unit. The minerals must be used with your previously purchased [PoolRx] [Product Name] unit. **These minerals do not need to go back into the [PoolRx] [Product Name] unit;** they just need to dissolve back into the pool water. These minerals generally need to be replaced every 4 - 6 months, depending on your swim conditions.

DIRECTIONS FOR USE

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

- Clean and backwash the filter before adding the [PoolRx] [Product Name] booster, you do not want the minerals to get stuck on the dirt and then backwashed out.
- Add 8 ounces of booster mineral per 7.5k – 20k gal into the skimmer or pump basket. Do not remove the existing [PoolRx] [Product Name] unit. The minerals will start dissolving immediately. Make sure there is at least 3 - 4 hours of the pump run cycle. This will ensure the minerals completely dissolve without getting caught up in the filter.
- Pump should run during the heat of the day
- The pool should turn over its volume of water at least 1.5 times per day, this normally requires 6 to 8 hours per day this depends on gallons of your pool and pump flow rate.
- Do not re-clean or backwash filter for at least 2 weeks so minerals can dissolve through the filter, whether it is a cartridge, D.E. or sand filter

Maintenance

[Maintain normal pool chemistry ranges] [Maintain normal chemistry]:

Chlorine (ppm)	0.5 – 1.0
pH	7.2-7.8
Alkalinity	80-120
Cyanuric Acid	10-80

Replace the unit in basket every 12 months.

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[Note to reviewer: For spas/hot tubs.]

Treats [100-400 Gal] [400 – 1000 Gal]

Net weight: [0.44 oz (12.5 grams)] [0.88 oz (25 grams)]

The spa/hot tub unit contains a proprietary blend of minerals that continuously and effectively eliminate algae. The specially treated alloy cylinder is packed with [PoolRx] [Product Name] mineral formulation. These minerals immediately dissolve out of the cylinder and form a stable residual throughout the spa/hot tub water. The minerals eliminate the algae while freeing up low levels of chlorine to be more active and productive in the water. During the spa/hot tub's filtration process the minerals are rejuvenated every time they return and pass through the cylinder. [PoolRx] [Product Name] minerals works synergistically with a constant low level of chlorine. Residential (0.5 - 1.0 ppm) Commercial (1.0 - 5.0 ppm)

DIRECTIONS FOR USE

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

- Clean your filter before adding the [PoolRx] [Product Name] spa/hot tub unit.
- Place the spa/hot tub unit into the skimmer or stick between the filter pleats.
- The spa/hot tub unit should be added when the spa/hot tub has a full run cycle to ensure the minerals dissolve out of the unit and through the filter into the whole body of water.
- The spa/hot tub should turn over its water volume at least 1.5 times per day.

Maintenance

Maintain normal chemistry:

Chlorine (ppm)	0.5ppm – 1.0
pH	7.2-7.8
Alkalinity	80-120

Replace the [PoolRx] [Product Name] spa/hot tub unit every time the spa/hot tub is drained or every 4 - 6 months (this will depend on bather load and splash out). If you see algae coming back or the water looks a little dull you know it's time to replace your spa/hot tub unit.

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[Note to reviewer: For Sundance® Spas.]

Treats 400 – 1000 Gal

Net weight: 0.88 oz (25 grams)

This product is intended for use with Sundance® Spa hot tubs. The spa/hot tub unit contains a proprietary blend of minerals that continuously and effectively eliminate algae. The specially treated alloy cylinder is packed with [PoolRx] [Product Name] mineral formulation. These minerals immediately dissolve out of the cylinder and form a stable residual throughout the spa/hot tub water. The minerals eliminate the algae while freeing up low levels of chlorine to be more active and productive in the water. During the spa/hot tub's filtration process the minerals are rejuvenated every time they return and pass through the cylinder. [PoolRx] [Product Name] minerals works synergistically with a constant low level of chlorine. Residential (0.5 - 1.0 ppm)
Commercial (1.0 - 5.0 ppm)

DIRECTIONS FOR USE

It is a violation of federal law to use the product in a manner inconsistent with its labelling.

- Clean your filter before adding the spa/hot tub unit
- Install the spa/hot tub unit into the Sundance® Spa filter gate chamber. If installing in a non- Sundance® Spa, place the spa/hot tub unit in the skimmer basket or place the unit on the bottom of your spa/hot tub.]
- The sundance spa unit should be added when the spa/hot tub has a full run cycle to ensure the minerals dissolve out of the unit and through the filter into the whole body of water
- The spa/hot tub should turn over its water volume at least 1.5 times per day

Maintenance

Maintain normal chemistry:

Chlorine (ppm)	0.5ppm – 1.0
pH	7.2-7.8
Alkalinity	80-120

Replace the [PoolRx] [Product Name] spa/hot tub unit every time the spa/hot tub is drained or every 4 - 6 months (this will depend on bather load and splash out). If you see algae coming back or the water looks a little dull you know it's time to replace your spa/hot tub unit.

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Sizing

The variance, 4 to 6 months is dependent on backwash, splash out, bather load, algae kill. Also available for spas/hot tubs: spa unit (part #101057 for 100-400 gallons) & (part # 10105 5 for 400-1000 gallons)

NOTE: The hazards and information contained in this warning are for the product, as delivered. The product is intended to be diluted into large amounts of water, where the dissolved solution will not pose the same hazards or concerns.

{Optional Additional Text for use on Product Label or Collateral Labeling}

- The EPA Registered, NSF Certified [PoolRx] [Product Name] is non-corrosive and do not adversely affect water chemistry. Normal pool chemistry ranges required. The [PoolRx] [Product Name] method is proven to provide algae free water with less chemicals providing a healthier, safer, eco-friendly swimming environment.
- #1 choice of pool professionals
- 4pack blue units
- 4pack boosters
- 4pack extremes
- 6 Month Algaecide
- Also ideal for salt pools
- Amazing formula
- Best kept secret for sparkling clear pool
- Black unit
- Blue unit
- Booster
- Booster mineral bucket
- Booster minerals
- Booster unit
- Certified to NSF/ANSI 60
- Chelated minerals
- Commercial unit
- Don'ts:
 - NO* Cael hypo directly to pool dilute in water first
 - NO* algaecides
 - NO* phosphate removers
 - NO* sodium bromide
 - NO* clarifiers
 - NO bromine*
 - NO Biguanides*
- Eliminates all [types of] algae
- Eliminates algae
- Extreme unit
- Fast acting and long lasting
- For use in residential and commercial pools and spas/hot tubs

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- Green to clear half the time, half the money
- Healthier water
- Ideal for salt pools
- Ideal for chlorine and salt pools
- Improves water quality
- Improves look and feel of your water
- Improves the quality of water and bather experience
- Less chemicals
- Less money
- Less work
- Mineral algaecide
- Mineral booster [7.5k to 20k gallons]
- Mineral commercial unit
- Mineral extreme unit [20k-30k gallons]
- Mineral granular bucket: equals 20x boosters
- Mineral spa/hot tub unit: [100-400 Gal] [400 – 1000 Gal]
- Mineral technology
- Mineral unit [7.5k to 20k] [20 k to 30k]
- No installation
- Non-staining
- Not compatible with biguanides
- Not compatible with bromine
- Not for use with biguanides
- Not for use with bromine
- Patented chelating agents
- Pools [7,500 to 20,000] [20,000 to 30,000] gallons
- Pool unit [7.5k to 20k] [20 k to 30k]
- [PoolRx] [Product Name] 4pack - blue units: 7.5-20k gallons
- [PoolRx] [Product Name] 4pack - booster mineral; 7.5k-20k gallons
- [PoolRx] [Product Name] 4pack - extreme black units; 20k-30k gallons
- [PoolRx] [Product Name] blue unit; 7.5k-20k gallons
- [PoolRx] [Product Name] booster mineral bucket: contains 20x boosters
- [PoolRx] [Product Name] booster mineral; 7.5k-20k gallons
- [PoolRx] [Product Name] commercial unit only; (needs part#: 102003) 75k-500k gallons
- [PoolRx] [Product Name] extreme black unit; 20k-30k gallons
- [PoolRx] [Product Name] spa/hot tub unit: 400-1000 gallons
- [PoolRx] [Product Name] spa/hot tub unit; 100-400 gallons
- [PoolRx] [Product Name] spa unit for Sundance Spas®
- Prolongs life of pool equipment
- Prolongs water life
- Prolongs life of pool equipment and surfaces
- Proprietary mineral blend
- Reduces chemicals

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- Reduces chemical demand
 - Reduces energy use
 - Simple to use
 - Simplifies pool care
 - Simplifies spa/hot tub care
 - Simplifying pool care
 - Simplifies pool maintenance
 - Simply drop unit into skimmer or pump basket
 - Spa/hot tub unit black
 - Spa/hot tub unit yellow
 - Spa unit white
 - Sundance spa unit
 - Support for any size swimming pool
-
- Salt Pools:
 - Ideal for Salt Pools
 - Reduces the need for salt chlorine production to eliminate algae
 - Less high pH chlorine will be produced, only 0.5 to 1.0 ppm will be needed
 - This will reduce acid demand as there will be less high pH chlorine being produced
 - This will extend the life of salt cell. (Salt Cells are at least \$600.00 to replace)
 - Less scale build up on salt cell and pool surface, the [PoolRx] [Product Name] minerals are an effective descaler.
 - [PoolRx] [Product Name] improves the saltwater experience. The minerals reduce the salt chlorine production needed to keep your salt pool algae free. Less salt chlorine production extends the life of the salt cell and reduces the amount of acid needed to balance the pH. [PoolRx] [Product Name] prolongs the life of your equipment, saves you money and improves the quality of your water.

{ Administrative Notes: Bracketed text [] indicates optional text for different version of product label.
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- [Pictograms]



- [Logo]



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Quick Start Guide

[Note to Reviewer: The Quick Start Guide is reference material and is not part of the pesticide label.]

- Clean or backwash your filter before adding PoolRx
- Place the correct sized [PoolRx] [Product Name] Unit/s based on total gallons into Pump Basket or Skimmer (See below for other [PoolRx] [Product Name] products)
- Ideally place in pump basket for increased water flow, and leave Unit in basket for 1 year. Add Booster if needed in 4-6 months
- [PoolRx] [Product Name] should be added to the pool during the heat of the day, when the pool has at least 3 - 4hours remaining of run time. This will ensure the minerals completely dissolve out of the Unit and disburse through the filter, into the body of water.
- The Pool should turn over its volume of water at least 1.5 times per day, this normally is 6 - 8 hours per day, depending on the total gallons of your pool and pool pump flow rate.
- Maintain normal pool chemistry with as little as 0.5ppm of chlorine and no specialty chems. You can maintain a higher chlorine ppm if desired, however it is just not necessary.
- Do not re-clean or backwash filter for at least 2 weeks so after installation so that minerals can completely dissolve through the filter, whether it is a cartridge, DE or sand filter
- Filter pressure may rise slightly, but will come back down after minerals dissolve through filter into solution, this is normal.

Part1

What happens when you add PoolRx?

- The minerals are packed inside the rejuvenating cylinder and once added to water, completely dissolve out of the [PoolRx] [Product Name] Unit (normally within one pump cycle).
- The minerals then form a stable residual throughout the entire body of water eliminating algae wherever it is in the pool/spa/hot tub and keep it from coming back even when the pump is not running.
- It is important to start with a clean filter as you do not want those precious minerals to get stuck on the dirt in the filter and get backwashed or cleaned out before they can work for you.

Part 2

- The [PoolRx] [Product Name] Unit which has the cylinder in the center needs to be placed where it gets good water flow over it, because the minerals are rejuvenated or re-energized when they pass back over the cylinder during circulation.
- The connectivity with the minerals and the alloy cylinder is what makes [PoolRx] [Product Name] so effective and able to last 4 - 6 months.
- The longevity of the minerals is determined by the amount of algae kill, backwash, filter cleaning and splash out. Over time the minerals are continually being used up and/or diluted by these factors.

When do I need to add more Minerals?

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If you see algae coming back or the water looks a little dull you know it's time to replace these lost minerals with the [PoolRx] [Product Name] Booster (Part number 102001). In warmer climates or year round pool seasons, add the [PoolRx] [Product Name] Booster minerals when needed or after 6 months. Start with a new [PoolRx] [Product Name] Unit at the beginning of each season.

Where do I add the [PoolRx] [Product Name] Booster?

Same as the [PoolRx] [Product Name] Unit; start with a clean filter and simply add the [PoolRx] [Product Name] Booster to the skimmer or pump basket. The [PoolRx] [Product Name] Booster does not go back inside the [PoolRx] [Product Name] Unit. Simply open the white tub and dump the contents in the skimmer or pump basket, they will start to dissolve immediately. The new minerals will boost the mineral content in the water to again be effective against algae in the entire body of water, and rejuvenate as they pass back over the original [PoolRx] [Product Name] Unit (now empty) during circulation. Unfortunately the longevity of the minerals is not an exact science, as each pool is different with different conditions. However pools may differ, [PoolRx] [Product Name] will work in any pool or spa/hot tub. If the correct dosage is added and basic pool chemistry and the “Pool Basics” are adhered too, [PoolRx] [Product Name] will eliminate all types of algae and reduce chemicals for up to 6 months.

How often do I replace the [PoolRx] [Product Name] Unit?

The [PoolRx] [Product Name] unit should be replaced every year. The rejuvenating cylinder gets calcified and oxidized during the year and will not rejuvenate the minerals as effectively after the first year. We recommend starting with a new [PoolRx] [Product Name] Unit every year for best results and cost effectiveness.

What type of Filter can I use?

[PoolRx] [Product Name] will work with any type of filter. Please make sure it is clean and that there is at least 3 hours of pump run time left before adding [PoolRx] [Product Name] as the minerals dissolve out of the [PoolRx] [Product Name] Unit immediately and it's important to get as much of the minerals dissolving consistently to form a stable residual in the water to eliminate algae.

Will I see an increase in Filter pressure?

It's quite normal to see a slight increase in pressure for a couple of hours while the minerals dissolve into solution and work through the filter. It's not uncommon for the minerals to take a few weeks to completely dissolve. This is why we suggest you do not backwash for at least 2 weeks after installing the [PoolRx] [Product Name] Unit or [PoolRx] [Product Name] Booster. The minerals will still work, eliminating algae if still stuck in filter after initial installation.

Why don't I need Phosphate Removers, Clarifiers or Algaecides anymore?

[PoolRx] [Product Name] and a low residual of chlorine replaces the need for these ineffective specialty chemicals. Phosphates are just food for algae. So if there is little ALGAE, it does not matter how high your phosphate level is. With [PoolRx] [Product Name] in the water, Algae CAN NOT survive, so phosphates are not an issue. You don't need a Clarifier because [PoolRx] [Product Name] minerals free up low levels of chlorine to be more active and available in the

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water, so your chlorine can now really clarify the water. Finally, you don't need another Algaecide, because [PoolRx] [Product Name] is effective.

Do I need to follow normal pool maintenance procedures?

Yes, with or without using [PoolRx] [Product Name] you should maintain normal pool chemistry ranges and test and balance your water weekly. You should also test for excessive minerals and metals at least once per year that may be coming from source water, old plumbing etc. If you have natural metals in your water, we recommend using a product called CUlator by Periodic Products. This product will pull any metals or minerals out of the water. In the rare event this is necessary, use prior to installing [PoolRx] [Product name]. Please see below for normal pool chemistry ranges: Residential (0.5 - 1.0 ppm); Commercial (1.0 - 5.0 ppm)

Maintenance

Residential Chlorine (ppm)	0.5 – 1.0
Commercial Chlorine (ppm)	1.0- 5.0
pH	7.2-7.8
Alkalinity	80-120
TDS	0-5000
Calcium Hardness	200-500
Cyanuric Acid	10-80