



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

April 21, 2015

Coleen Waldenmayer
CamelBak Products, LLC
Keller & Heckman LLP
1001 G Street, NW, Suite 500 West
Washington, DC 20001

Subject: Label Amendment – Clarify Directions for Use between different system kits
Product Name: T.O.P.S. System
EPA Registration Number: 88622-1
Application Date: 02/13/2015
Decision Number: 500450

Dear Ms. Waldenmayer:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

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.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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EPA Reg. No. 88622-1
Decision No. 500450

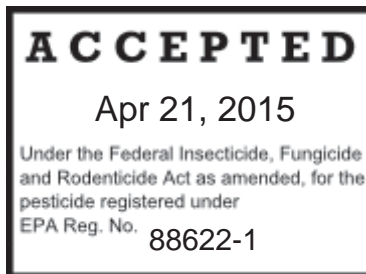
with FIFRA section 6. If you have any questions, please contact Seiichi Murasaki at murasaki.seiichi@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Seiichi Murasaki" with a stylized flourish at the end.

John Hebert, Chief
Regulatory Management Branch I
Antimicrobials Division (7510P)
Office of Pesticide Programs

CamelBak
TACTICAL OPERATIONS PURIFICATION SYSTEM (T.O.P.S.™)
Military Use Only
Includes T.O.P.S.™ Powder and T.O.P.S.™ Filter
To be used in conjunction with an existing compatible reservoir



The CamelBak Tactical Operations Purification System [T.O.P.S.™] provides a man-portable water treatment / microbiological purification system for individual soldier use in purifying drinking water obtained from indigenous fresh water sources in basic, hot, and cold environments. The system uses a combination of T.O.P.S.™ Powder technology and filtration to offer fast, easy to use and reliable water treatment.

Tested effective with water ranging in temperature from (4-23°C) and in clarity from clear to highly turbid.

This system requires 16 minutes of treatment time:
1 minute required to mix T.O.P.S. powder and water
15 minute rest period before consuming using the T.O.P.S.™ Filter

Effective against 99.9% of bacteria, viruses, and cysts, such as *Cryptosporidium*

T.O.P.S.™ Powder

Active Ingredients:	
Silver Nitrate	0.01%
Copper Sulfate Pentahydrate	0.72%
Other Ingredients	99.27%
Total	100.00%

KEEP OUT OF REACH OF CHILDREN	
DANGER	
FIRST AID	
If in eyes	<ul style="list-style-type: none"> - 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. - Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none"> - 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 by a poison control center or doctor. - Do not give anything to an unconscious person.
If on skin	<ul style="list-style-type: none"> - Take off contaminated clothing. - Rinse skin immediately with plenty of water for 15-20 minutes. - Call a poison control center or doctor for treatment advice.
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
For emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30 am to 4:30 pm Pacific Time (NPIC Web site: www.npic.orst.edu).	

EPA Reg. No. 88622-1
EPA Est. No.

CamelBak Products, LLC
2000 S. McDowell Blvd., Suite 200
Petaluma, CA 94954
USA 800-767-8725
www.camelbak.com

[Made in USA] – [Assembled in US with US & Imported Components]
[Contains 135 1-Liter/1-Quart Treatments] – [Contains 45 3-Liter Treatments]
Net Weight (of T.O.P.S. powder) _____

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Powder can cause irreversible eye damage. Powder is harmful if swallowed raw, without dilution. Do not get in eyes or on clothing. Wear protective eyewear such as goggles or safety glasses. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse. This product must be diluted in water and swallowed by the user. After dilution in accordance with the directions for use, no medical attention is required when the diluted solution is swallowed.

ENVIRONMENTAL HAZARDS

This powder is toxic to fish and aquatic invertebrates.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

PRODUCT STORAGE: Store unopened powder stick packs at room temperature; avoid excessive heat or direct sunlight.

PRODUCT DISPOSAL: Dispose of opened and unused powder stick pack in secondary containment compartment for normal waste disposal.

CONTAINER DISPOSAL: Place empty stick pack in personal waste compartment for normal waste disposal.

This system meets the standards of NSF P248 (Military Operations for Microbiological Water Purifiers).

[Optional Marketing Claims]

- Designed for the military
- Ideal for military operation
- Kills at least 99.9999% of bacteria [*Raoultella terrigena* (ATCC 33257)] in 16 minutes
- Kills at least 99.99% of viruses [Poliovirus strain (ATCC VR-59) and Rotavirus (ATCC VR-899) in 16 minutes
- Removes at least 99.9% of cysts (*Cryptosporidium parvum*) in 16 minutes
- Removes turbidity
- Improves taste and odor
- Reliable Water Anywhere

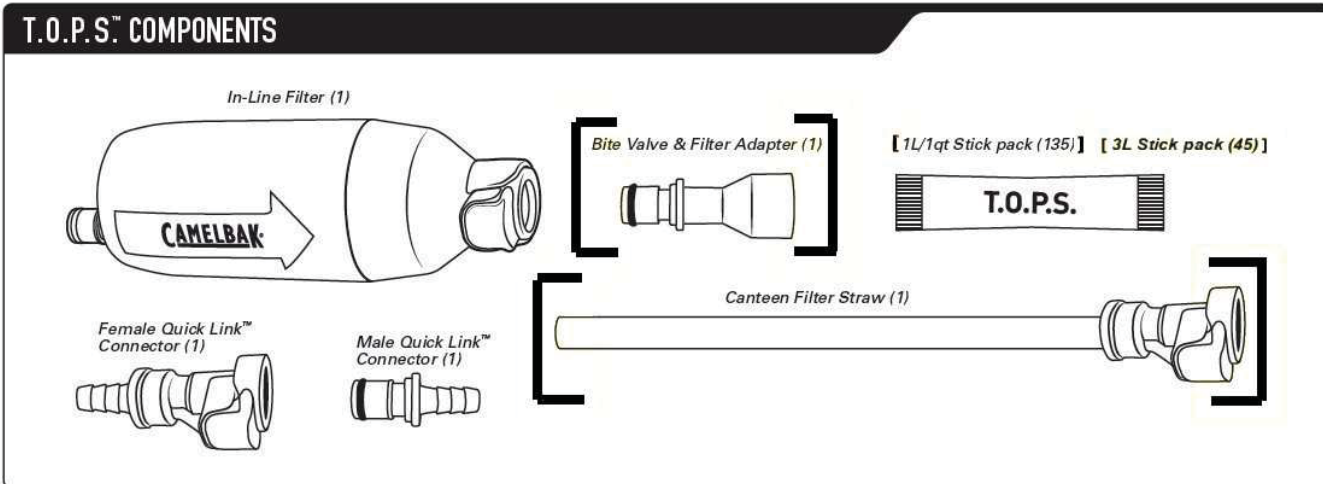
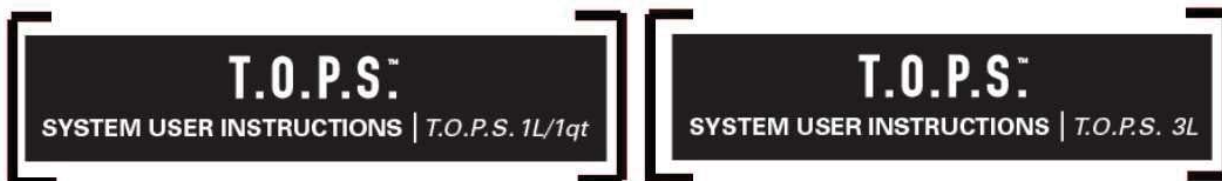
- [Potable water anywhere you go] – [Kills 99.9% of viruses, bacteria, and protozoa]
- Reliable water treatment in cold and warm environments
- Integrates with currently fielded hydration systems
- [Easy To Use] – [Simple 3-Step Process]



DIRECTIONS FOR USE

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

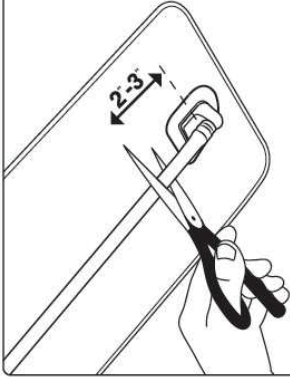
T.O.P.S.™ Powder is only to be used in conjunction with CamelBak's TACTICAL OPERATIONS PURIFICATION SYSTEM. This system is to be used for the purification of drinking water.



INSTALLATION OF QUICK LINK™ CONVERSION KIT FOR STANDARD 3L RESERVOIRS

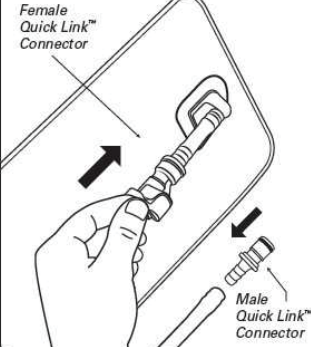
STEP 1

- Remove reservoir from carrier
- Cut tube 2"- 3" from base of reservoir



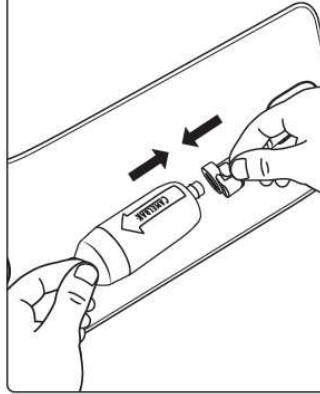
STEP 2

- Dip barbed ends of Male and Female Quick Link™ Connectors in rubbing alcohol
- With force insert the barbed end of the Female Quick Link™ Connector into the section of tubing connected to the reservoir
- With force insert the barbed end of the Male Quick Link™ Connector into the other section of cut tubing



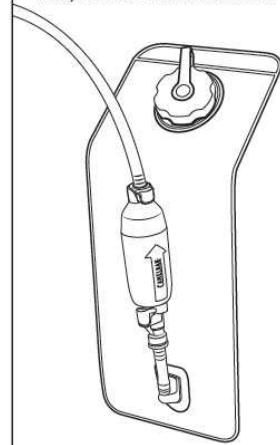
STEP 3

- Click filter into Female Quick Link™ Connector
- Click tube with Male Quick Link™ Connector into other end of the filter



STEP 4

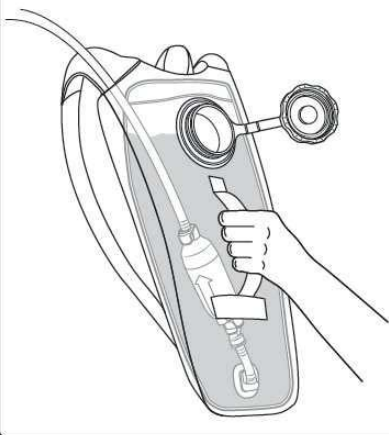
- Reservoir and filter assembled and ready to re-insert into MOLLE carrier



USER INSTRUCTIONS FOR THE 1L/1QT SYSTEM IN A 3L RESERVOIR

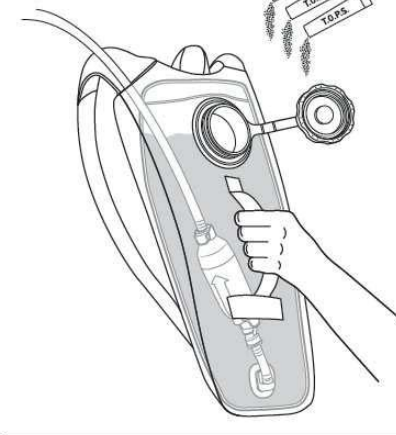
STEP 1

- Start with an empty reservoir and fill with 3 liters of untreated water



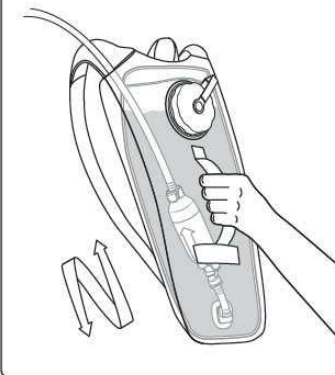
STEP 2

- Pour in three - 1L/1qt stick packs of T.O.P.S.™ purification powder



STEP 3

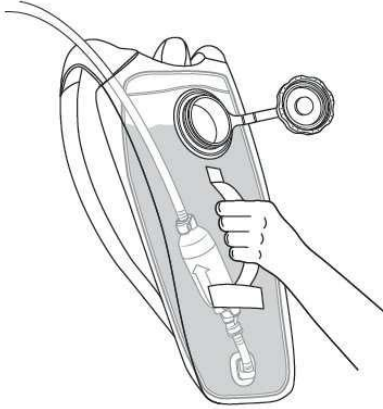
- Agitate vigorously for 1 minute
- Blow into tube for 2 seconds to clear any contaminated water from tube
- Wait 15 minutes (16 minutes total)
- Drink or dispense purified water through drink tube



USER INSTRUCTIONS FOR THE 3L SYSTEM IN A 3L RESERVOIR

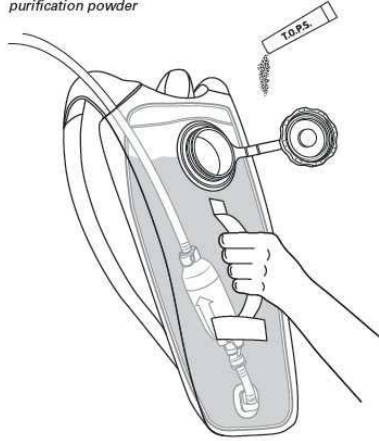
STEP 1

- Start with an empty reservoir and fill with 3 liters of untreated water



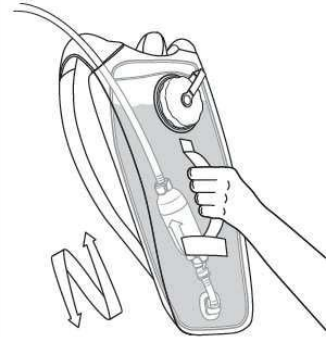
STEP 2

- Pour in one - 3L stick pack of T.O.P.S.™ purification powder



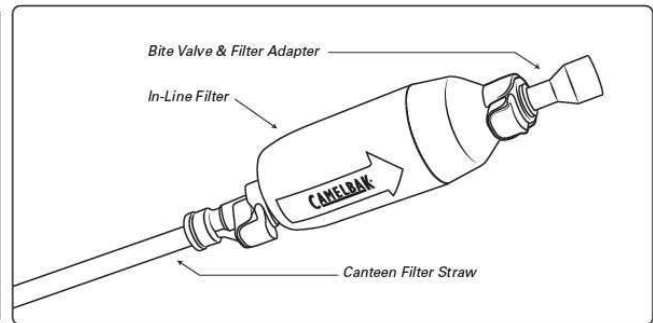
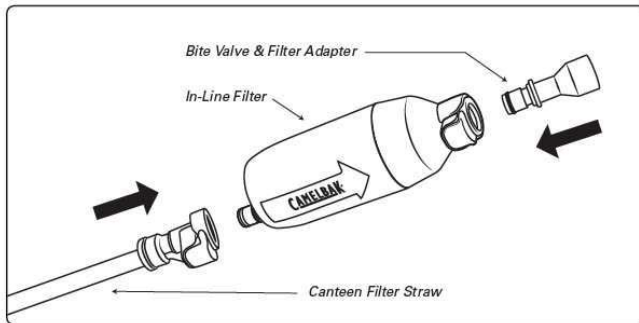
STEP 3

- Agitate vigorously for 1 minute
- Blow into tube for 2 seconds to clear any contaminated water from tube
- Wait 15 minutes (16 minutes total)
- Drink or dispense purified water through drink tube



PREPARATION OF IN-LINE FILTER FOR CANTEEN USE

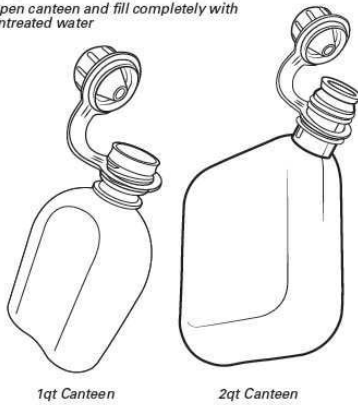
- Step 1: Click Bite Valve & Filter Adapter into the female end of the In-Line Filter
Step 2: Click Canteen Filter Straw into the male end of the In-Line Filter



SYSTEM USER INSTRUCTIONS USING 1 OR 2 QUART CANTEEN FOR PURIFICATION

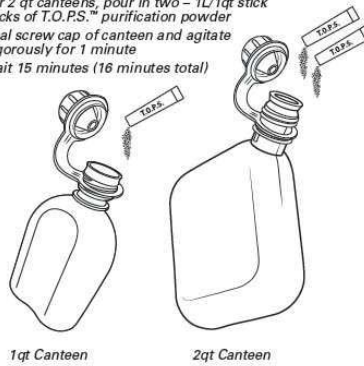
STEP 1

- Open canteen and fill completely with untreated water



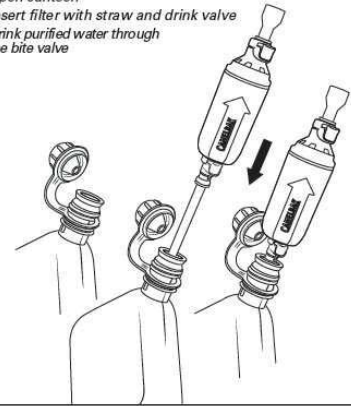
STEP 2

- For 1 qt canteens, pour in one – 1L/1qt stick pack of T.O.P.S.™ purification powder
- For 2 qt canteens, pour in two – 1L/1qt stick packs of T.O.P.S.™ purification powder
- Seal screw cap of canteen and agitate vigorously for 1 minute
- Wait 15 minutes (16 minutes total)



STEP 3

- Open canteen
- Insert filter with straw and drink valve
- Drink purified water through the bite valve



FILTER TROUBLESHOOTING

- At first use, entrapped air may diminish initial flow. Gently tap the side of the filter to "loosen" air bubbles and allow water to move through the filter.
- Filter flow is maximized with the filter oriented vertically. Use the filter with the flow arrow pointing up whenever possible.
- In order to increase flow, apply light pressure to the reservoir.

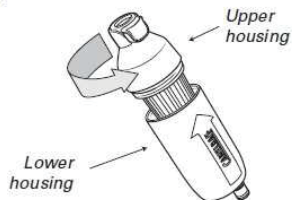
IN-LINE FILTER MAINTENANCE

Before resuming normal potable water use; remove filter from tube, clean reservoir and tube following normal procedures, and reconnect drink tube to reservoir with Quick Link™ connectors.

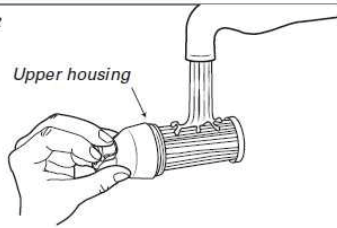
A cleaning process can be used to remove excess debris from the filter to reduce required suction pressure. To clean, use the following steps:

1. Unscrew the upper filter housing from the lower filter housing in a counterclockwise motion.
2. Rinse pleated filter membrane in a microbiologically safe water source, such as a faucet.
3. Once the cleaning procedure is complete, reassemble the filter housing by screwing the upper and lower filter housings together in a clockwise motion. Tighten to hand tight only.
4. If the filter will not be used for a period greater than 24 hours, rinse the filter as described in maintenance Steps 1-3, and drain.

STEP 1



STEP 2



STEP 3

