

Subject: EPA Approved alternative to the off-label use of Hyperchlorination for Remediating Cryptosporidium

The MAHC is an officially branded CDC product that has undergone a tremendous amount of review and legal approvals.

The MAHC ANNEX states the following:

5.7.3.3A Other Sanitizers, Disinfectants, or Chemicals

Other SANITIZERS, disinfectants, or chemicals used shall:

- 1) Be **EPA REGISTERED** under FIFRA if they are pesticides as defined by EPA,
- 2) Not create a hazardous condition or compromise disinfectant efficacy when used with required bromine or CHLORINE concentrations, and
- 3) Not interfere with water quality measures meeting all criteria set forth in this CODE.

5.7.3.3.1A Chlorine Dioxide Chlorine dioxide shall only be used for remediation for water quality issues when the AQUATIC VENUE is closed and BATHERS are not present.

Key: The highlighted parts above from the MAHC, are listed on the Cryptolyte[®] label.

Additional Clarification:

If you require additional information pertaining to your Department of Health's position regarding these Annex, please contact your State &/or local Health Department Officials.

If your Department of Health Official has additional questions, please direct them to Truox or contact Truox® and provide us with the Officials contact information so that we may contact and inform them directly.

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Additional Key Points of Interest:

Cryptolyte® is Registered with the States and provides the unprecedented ability to "Control,"

Confirm and Document Remediation" (3-log reduction of *Cryptosporidium*) ensuring Risk Mitigation.

Dumping a bucket of bleach into the pool is alternatively replaced by an Integrated System that Controls,

Confirms and Documents the entire process ensuring reproducibility regardless of the venue.

The EPA Registration further provides the ability to perform Daily Maintenance (Evening) thereby Mitigating Risk associated with infections resulting from the presence of <u>UNDETECTED</u> Chlorine Resistant Pathogens. Daily Maintenance delivers a low dose (below Drinking Water Standards) of chlorine dioxide <u>while the pool is closed and Bathers are not present</u>. In the morning no chemical adjustment is required before reopening.

Cryptolyte[®] was developed to address the <u>Underlying causes of Recreational Water Illness (RWI)</u> comprising not only Chlorine Resistant Pathogens but also formation and accumulation of Disinfection Byproduct (DBPs) exemplified by chloramines and trihalomethane. It is typical to operate with an ORP >800mV with ≤1.5ppm FAC. Combined Chlorine measurements at INDOOR pools are sustained at <100ppb.

To acquire the U.S. EPA Registration, Cryptolyte[®] was tested with >160ppm CYA present in the water to demonstrate that CYA does not affect the efficacy of Cryptolyte[®] even while exceeding recommended CYA guidelines.

Case Studies are being developed to demonstrate the cost associated with implementation of Cryptolyte® is off-set by reductions in chlorine use and elimination of alternative treatments exemplified by non-chlorine shocks, super-chlorination, filter aids and including UV.

In many instances only a system upgrade is required to transform the existing control system into an integrated Cryptolyte[®] control system by implementing a chip upgrade and sensor installation.

If you have questions or would like to discuss the capabilities of Cryptolyte[®] in more detail, feel free to contact me directly &/or visit our website to access informative papers and links.

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