

(10-05-04)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SUBJECT: Product Chemistry Review of **BioGuard Crystal Blue Mineral Cartridge**

DP Barcode: **D303632**
Manufacturing-use []

Reg. No. or File Symbol: **5185-UIO**
End-use Product [X]

Active Ingredient Composition:

Silver Metallic**63.5%

** From Silver Nitrate

TO: Marshall Swindell PM 33

FROM: Alex Traska, Chemist
Product Science Branch, CT Team
Antimicrobials Division (7510C)

AT 10/5/04

THRU: Karen P. Hicks, CT Team Leader
Product Science Branch
Antimicrobials Division (7510C)

K.P. Hicks
10/5/04

THRU: Michele E. Wingfield, Chief
Product Science Branch
Antimicrobials Division (7510 C)

BACKGROUND:

This application for a new product registration, for the subject swimming pool sanitizer cartridge, was submitted by Margery M. Exton, Consultant, on behalf of the registrant, Bio-Lab, Inc.

The registrant, in this application, has requested the approval to register a new end-use swimming pool sanitizer cartridge which is based on the use of metallic silver. The metallic silver is derived from an unregistered source of silver nitrate.

The following documents were submitted and examined in the review of this submission: agent's cover letter and transmittal document both dated March 22, 2004, application for a new product registration dated 3/19/04, proposed Basic CSF dated 3/19/04, proposed product label dated 03/22/04 and Product Chemistry Data for Guidelines # 830 Group A and B under MRID # 462322-01, -02, -03 and -04 dated March 12 and 17, 2004. Also reviewed was the pending jacket file #5185-UOI.

FINDINGS:

1. The requirements of PR Notice 91-2 were satisfied. The nominal concentration of the active ingredient (A.I.) given in the proposed Basic CSF agreed with the percentage declared on the label.
2. The source of the A. I., metallic silver, is from silver nitrate which is unregistered. Currently, there are no registered TGAI or MP sources of silver nitrate.
3. The certified limits for the A.I. as shown in the CSF and discussed under certified limits OPPTS 830.1750 were acceptable. However, the UCL as given should be changed from 103 % to 100%.
4. The Product Chemistry studies were complete, consistent with the physical and chemical characteristics of metallic silver and silver nitrate and are accepted.
5. All other elements of the Basic CSF and data package were acceptable.

RECOMMENDATIONS:

This new product application, covering the new end-use product intended as

a swimming pool sanitizer under the **BioGuard Crystal Blue Mineral Cartridge** registration, is accepted with comment.

Registrant should at the next convenient time address the comment noted under item #3 of the Findings.

10/05/04 AT