



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

Subject: Acute Toxicity Review for EPA Reg. No.: 67712-RL
DP Barcode: D303269

To: Marshall Swindell/Tony Kish
Regulatory Management Branch I
Antimicrobials Division (7510C)

From: Chris Jiang, Chemist
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Product Science Branch
Antimicrobials Division (7510C)

Through: Karen Hicks, Team Leader
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Applicant: Zodiac Pool Care, Inc.

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	% by wt.
Metallic silver **	3.51 %
<u>Other Ingredient(s):</u>	<u>88.26%</u>
Total:	100.00%

**From silver nitrate

CJ
K. P. H. B.
6/8/04

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BACKGROUND: Zodiac Pool Care, Inc. has submitted a package which includes a toxicity discussion and a waiver request for all product-specific acute toxicity studies on a product used for swimming pool treatment.

RECOMMENDATIONS: PSB findings are:

All product-specific acute toxicity data can be waived. The "toxicity discussion" discusses the product which is composed of pea-sized pellets of silver-coated alumina spheres (from a call to the agent that represents the registrant) which are encased in a sealed cartridge made of polypropylene or acetal with snap-fit caps. This packaging prevents consumer contact with the spheres. As for inhalation, the water treatment material is bound too well to the carrier matrix to allow for significant inhalation. As for sensitization, the product is not composed of any known sensitizers.

acute oral toxicity	IV	waived
acute dermal toxicity	IV	waived
acute inhalation toxicity	IV	waived
primary eye irritation	IV	waived
primary skin irritation	IV	waived
dermal sensitization	non-sensitizer	waived

LABELING

On the label, the ingredient statement needs to add up to 100%.