



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

September 10, 2015

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Mr. Mark Jernigan  
Registration Manager, Pool  
BioLab, Inc.  
Post Office Box 300002  
Lawrenceville, GA 30049-1002

Subject: Notification per PRN 98-10 – Minor Label Changes  
Product Name: **Alpha Initiator**  
EPA Registration Number: **5185-400**  
Application Date: June 10, 2015  
Decision Number: 506125

Dear Mr. Jernigan:

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.

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EPA Reg. No. 5185-400  
Decision No. 506125

If you have any questions, you may contact Killian Swift at 703-308-6346 or via email at [Swift.Killian@epa.gov](mailto:Swift.Killian@epa.gov).

Sincerely,



Demson Fuller  
EPA Product Manager 32  
Regulatory Management Branch II  
Antimicrobials Division (7510P)  
Office of Pesticide Programs

{All text in brackets [xxx] is optional and may or may not be included on a final label.}  
{All text in braces {xxx} is administrative and will not appear on a final label.}

## NOTIFICATION

5185-400

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:

09/10/2015

### ALPHA INITIATOR

#### ACTIVE INGREDIENT:

Trichloro-s-triazinetrione 93.9%

OTHER INGREDIENTS: 6.1%

TOTAL INGREDIENTS: 100.0%

[(Each stick weighs approximately 1/2 lb.)]

#### KEEP OUT OF REACH OF CHILDREN

#### DANGER

See [back] [side] panel for First Aid and additional precautionary statements.

BIO-LAB, INC.  
PO Box 300002  
Lawrenceville, Georgia 30049

EPA REG. NO. 5185-400  
EPA EST. NO. 5185-GA-1

NET WEIGHT: *{as indicated on container}*

[Made in USA]

[SPECIFICALLY FORMULATED FOR USE IN SKIMMERS]  
[Swimming Pool Sanitizer]  
[Gentle on equipment and liners]  
[Convenient to use]  
[Contains SmartGuard® Chlorine Protector]  
[with SmartGuard®]  
[with SmartGuard® and SilkGuard®]  
[Chlorinating sticks for once-a-week skimmer application.]  
[Step 1] *{This is to advise consumers that this product is Step 1 of a 3 step program to keep their swimming pool water clean.}*  
[Kills bacteria]  
[Kills algae]  
[Inhibits Algae]  
[[With SilkGuard®] prevents corrosion & metal staining, reduces scale formation, softens water]  
[Slow-Dissolving Sanitizer]  
[Controlled dissolving Chlorinating Sanitizer]  
[Controls Bacteria and Algae]  
[Controls Algae]  
[Kills Bacteria and Controls Algae]  
[Kills Bacteria and Algae]  
[With built in scale preventative and sunlight protector]  
[With built in corrosion preventative and sunlight protector]  
[With built-in metal stain inhibitor, scale preventative, water softener and sunlight protector]  
[With built-in Sunlight Protector]  
[With SUNSHIELD® Protects chlorine from sunlight, so you use less]  
[With built-in metal stain inhibitor, scale preventative, water softener]  
[Helps prevent corrosion & metal staining]  
[Reduces Scale Formation]  
[Makes water soft and smooth]  
[Softens Water]  
[Protects pool equipment for longer life]  
[Multifunctional Chlorinating Stick]  
[Compound action chlorinating stick]  
[Long lasting multifunctional chlorinating stick]  
[Once a week skimmer application]  
[Lasts one week\*]  
[Add once a week\*]  
[Once-A-Week\*]  
[\*use per label directions] *{or}* [\*Approximate addition rate. Please refer to directions for use.]  
[Once a week sanitizer]  
[Skimmer applied Chlorinating Stick [with SilkGuard®]]  
[[SilkGuard®] Prevents corrosion & metal staining, reduces scale formation, softens water]  
[With SilkGuard®]  
[Featuring SilkGuard® Technology]  
[Featuring SmartGuard® Technology]

[Featuring SmartGuard® and SilkGuard® Technology]

[Maintains Brilliantly Clear Water]

[Sanitizer of choice for BioLab UV system]

[Ideal for use with BioLab UV system]

[Suitable for use with BioLab UV system]

[Compatible with BioLab UV system]

[BioLab UV system approved.]

[Use Alpha Initiator with BioLab UV system]

[Maintain] *{Designates that this product is part of maintenance line of products}*

[[With SmartGuard®,] chlorinating sticks do not dissolve when pump is off]

[SmartGuard® extends life of chlorinating stick for weekly skimmer application]

[SilkGuard® softens water and coats metal surfaces to protect against rusting and metal staining]

[SilkGuard® binds hard water components, reducing scaling]

[[Sunlight protector][Sunshield®] protects chlorine from sunlight so you use less product than with unstabilized chlorines such as liquid bleach or calcium hypochlorite]

[Sanitizes]

[BioGuard Care System]

*{The “BioGuard Care System” below may be placed on the label to allow easy product identification by consumers.}*

[BioGuard Care System ( X ) Sanitizer ( ) Shock ( ) [Algicide][Algaecide]]

<b>Our Ingredients:</b>	<b>What They Do:</b>
Chlorine	Sanitizes, Kills Bacteria, Controls Algae
[Sunlight Protector] [-] [SUNSHIELD®]	Protects chlorine from sunlight so you use less product than with unstabilized chlorines such as liquid bleach or calcium hypochlorite.
[SilkGuard®]	Softens water and coats metal surfaces to protect against rusting and metal staining. Binds hard water components, reducing scaling.
[SmartGuard®]	Extends life of chlorinating stick for weekly skimmer application. Chlorinating sticks do not dissolve when pump is off.

*{To maintain brand segmentation, two sets of marketing statements are provided to maintain separate brand identity. One of the following Options will be used on the label.}*

*{Optional marketing paragraph A}*

[BioGuard® has a wide variety of products that are required to maintain a quality swimming environment. These products are designated as “Maintain”.]

BIOGUARD® ALPHA INITIATOR with SmartGuard® and SilkGuard® is unique and effective as a pool [chlorinating] water sanitizer. SmartGuard® regulates the dissolving rate of ALPHA INITIATOR extending sanitizing power and controlling performance during application. SilkGuard makes water soft and smooth at the same time protecting your equipment and pool from scale, corrosion and stains due to corrosion.

[For best results follow the BioGuard Once-A-Week Three [Part] [Step] System;  
Weekly Add:

1. ALPHA INITIATOR with SilkGuard® to sanitize your pool.
2. Shock your pool with [a shock product] [a BioGuard® oxidizer] [BioGuard® Smart Shock] [or] [BioGuard® Easy Shock and Swim] [or] [BioGuard® BurnOut® Extreme] [or] [BioGuard® BurnOut® 35] [or] [BioGuard® BurnOut<sup>3</sup>].
3. Prevent algae with [BioGuard® Back Up] [or] [BioGuard® Algae All 60] [or] [BioGuard® Banish] [or] [a BioGuard Algicide].]

[The BioGuard® Care System has three important parts that help you maintain crystal blue sparkling water.

- A sanitizer to control bacteria
- A shock to destroy contaminants
- A preventative [algicide][algaecide] to stop algae before it starts

All parts of the BioGuard Care System are vital to achieve beautiful water.]

[Alpha Initiator] {or} [This product] should be used as a maintenance sanitizer when using the BioLab UV system].

*{Optional marketing paragraph B}*

[BioGuard® has a wide variety of products that are required to maintain a quality swimming environment. These products are designated as “Maintain”.]

BIOGUARD® ALPHA INITIATOR with SilkGuard® is a multifunctional [chlorinating] sanitizer that kills bacteria and controls algae, prevents metal staining and corrosion, reduces scale formation and softens water. Its unique additive actually coats metal surfaces, protecting them against corrosion. Additionally, this additive protects pool surfaces from metal stains and acts like a magnet to bind hard water components, making your pool water soft and smooth.

The SmartGuard® in ALPHA INITIATOR regulates the dissolving rate of ALPHA INITIATOR so you do not have to add them as frequently. Use ALPHA INITIATOR for convenience, protection of your pool and equipment, and better feeling sparkling water.

This sanitizer contains [SUNSHIELD®, which protects chlorine from sunlight, so you use less.] {or} [sunlight protected chlorine.] It's the perfect solution for clear, silky smooth, inviting pool water.

[For best results follow the BioGuard Once-A-Week Three [Part] [Step] System;  
Weekly Add:

1. ALPHA INITIATOR with SilkGuard® to sanitize your pool.
2. Shock your pool with [a shock product] [a BioGuard® oxidizer] [BioGuard® Smart Shock] [or] [BioGuard® Easy Shock and Swim] [or] [BioGuard® BurnOut® Extreme] [or] [BioGuard® BurnOut® 35] [or] [BioGuard® BurnOut<sup>3</sup>].
3. Prevent algae with [BioGuard® Back Up] [or] [BioGuard® Algae All 60] [or] [BioGuard® Banish] [or] [a BioGuard Algicide].]

[The BioGuard® Care System has three important parts that help you maintain crystal blue sparkling water.

- A sanitizer to control bacteria
- A shock to destroy contaminants
- A preventative [algicide][algaecide] to stop algae before it starts

All parts of the BioGuard Care System are vital to achieve beautiful water.]

[Alpha Initiator] {or} [This product] should be used as a maintenance sanitizer when using the BioLab UV system].

**DIRECTIONS FOR USE:** It is a violation of Federal Law to use this product in any manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

**INITIAL START-UP.** Consult your BioGuard dealer for initial water balance and start-up procedures. Ensure that pool equipment is operating properly. [Backwash according to manufacturer's directions and clean filter using [Strip Kwik®] [and/or] [Kleen It®] [or] [an appropriate filter cleaner] as necessary.] {or} [Clean or backwash filter following manufacturer's directions.] Add [Stabilizer 100] {or} [stabilizer] to establish a minimum level of 30-40 ppm. [Superchlorinate]{or}/[Shock] pool water with [a shock product] [BioGuard® Smart Shock®] [or] [BioGuard® Easy Shock and Swim®] [or] [BioGuard® Burn Out Extreme®] [or] [BioGuard® Burn Out® 35] [or] [BioGuard® BurnOut<sup>3</sup>] to obtain a chlorine level of 1-4 ppm. Add initial dosage of [BioGuard® Back-Up®] [or] [BioGuard® Algae All 60®] [or] [BioGuard® Banish] [algicide][algaecide] [or] [a BioGuard Algicide] per label directions to prevent algae. When using

other products as outlined in directions for this product, always follow directions on those products. With the pump operating, add one [ALPHA INITIATOR] [stick] to the pool skimmer basket for each 5,000 to 7,000 gallons of water or a portion thereof. (\*\*See below) Divide number of sticks evenly for pools with multiple skimmers. Pool circulation must continue for a minimum of 10 - 12 hours to form the protective skin that reduces the erosion of the ALPHA INITIATOR.

**ROUTINE MAINTENANCE:** Test pool water periodically. Maintain pH of 7.2-7.6 and chlorine level of 1.0-4.0 ppm. At least twice a season, have your BioGuard dealer analyze for total water balance.

About once a week, with pump operating, add one [ALPHA INITIATOR] [stick] to the pool skimmer basket for each 5,000 to 7,000 gallons of water. Pool circulation must continue for a minimum of 10 - 12 hours to form the protective skin that reduces the erosion of the ALPHA INITIATOR. Shock pool with [a BioGuard® oxidizer] [BioGuard® Smart Shock®] [or] [BioGuard® Easy Shock and Swim] [or] [BioGuard® Burn Out Extreme®] [or] [BioGuard® Burn Out® 35] [or] [BioGuard® BurnOut<sup>3</sup>] per label directions and add maintenance dosage of [BioGuard® Back-Up] [or] [BioGuard® Algae All 60] [or] [BioGuard® Banish] [algicide][algaecide] [or] [a BioGuard Algicide] per label directions to prevent algae.

Operate pool recirculation system a minimum of 10 hours per day. Adjusting the hours of pool recirculation or the number of sticks added to the skimmer helps to regulate the sanitizer level.

After four applications, you will experience the full benefits of softened water and equipment protection from SilkGuard®.

\*\*The number of sticks and frequency of addition will vary with the number of swimmers, water temperature, rain showers and pump operating time. You should begin with the one stick per 5,000 gallon rate for heavy bather loads or elevated water temperature.

**Reentry into treated swimming pools is prohibited above levels of 4 ppm chlorine due to risk of body injury.**

**STORAGE AND DISPOSAL:** Keep this product dry in original tightly closed container when not in use. Store in a cool, dry, well-ventilated area away from heat or open flame. **CONTAINER DISPOSAL:** Non-refillable container. Do not reuse or refill this container. Offer for recycling if available. If recycling is not available, dispose of empty container in trash. Triple rinse container (or equivalent) promptly after emptying.

**PRECAUTIONARY STATEMENTS:**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS: DANGER: Corrosive.** Causes irreversible eye damage and skin burns. May be fatal if swallowed or inhaled. Do not breathe dust or fumes. Irritating to nose and throat. Do not get in eyes, on skin or on clothing. Wear safety eyewear (safety goggles). Wear protective clothing and rubber gloves. 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.

**PHYSICAL OR CHEMICAL HAZARDS: STRONG OXIDIZING AGENT:** Do not mix with other chemicals. Mix only with water. Never add water to product. Always add product to large quantities of water. Use clean dry utensils. Do not add this product to any dispensing device containing remnants of any other product. Such use may cause a violent reaction leading to fire or explosion. Contamination with moisture, organic matter or other chemicals will start a chemical reaction and generate heat, hazardous gas, possible fire and explosion. In case of contamination or decomposition, do not reseal container. If possible, isolate container in open air or well ventilated area. Flood area with large volumes of water.

**FIRST AID: 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. **IF ON SKIN OR CLOTHING:** 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. **IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call poison control center or doctor for treatment advice. **IF SWALLOWED:** Call 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 the poison control center or doctor. Do not give anything by mouth to an unconscious person.

**Have the product container or label with you when calling a poison control center or doctor, or going for treatment. [IN CASE OF MEDICAL EMERGENCY, CALL [1-303-623-5716] [1-877-800-5553] [telephone number supplied by supplemental registrant].]**

**Note to Physician:** Probable mucosal damage may contraindicate the use of gastric lavage.

*{Environmental hazards statement for end-use products of less than 5 gallons (liquid) or less than 50 pounds (solid, dry weight).}*

**[ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish and aquatic organisms.]

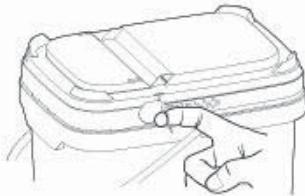
*{Environmental hazards statement for end-use products in containers of equal to or greater than 5 gallons (liquid) or equal to or greater than 50 pounds (solid, dry weight).}*

**[ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.]

[NOTE: Buyer assumes all responsibility for safety and use not in accordance with directions.]

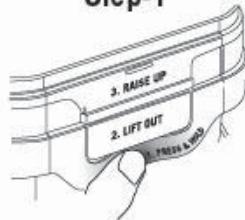
[NOTE: User assumes all responsibility for use not in accordance with directions.]

**Tamper Evident Tear Strip**  
Tear away by using "ring pull" on  
either side of lid

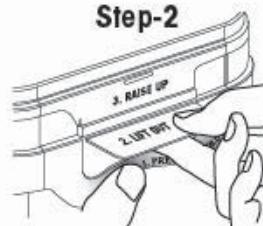


To open the lid (after the  
tear strip is removed)

**Step-1**



**Step-2**



**Step-3**

