

EEE BRANCH REVIEW

DATE: IN _____ OUT _____ IN _____ OUT _____ IN 10/28/75 ^{OUT} 10/29/75
FISH & WILDLIFE ENVIRONMENTAL CHEMISTRY EFFICACY

FILE OR REG. NO. 35966-E

PETITION OR EXP. PERMIT NO. _____

DATE DIV. RECEIVED 10/24/75

DATE OF SUBMISSION 10/22/75

DATE SUBMISSION ACCEPTED _____

TYPE PRODUCT(S): I, (D,) H, F, N, R, S Bacteriostatic Water Filter

PRODUCT MGR. NO. 33

PRODUCT NAME(S) Waterco Model AS-5

COMPANY NAME Waterco Industries, Inc.

SUBMISSION PURPOSE Resubmission with data

CHEMICAL & FORMULATION Silver (as elemental) 0.186%

- 200.0 Introduction
- 200.1 Use: Bacteriostatic Water Filter
- 200.2 Background Information: This submission includes control data requested in paragraph 5(a) of our letter of October 7, 1975. Data requested in paragraph 5(b) were withdrawn since the registrant was not informed of this requirement prior to testing the product.
- 201.0 Data Summary
- 201.1 Abstract of Test Report: Bacteriological assays were made to verify survival of Escherichia coli in water for a 24-hour period; the initial count of 544 E. coli per ml decreased to 68 E. coli per ml in 24 hours.
- 202.0 Recommendations
- 202.1 Claims Supported by Data: The control data submitted fulfill the request indicated in our letter of October 7, 1975.
- 203.0 Labeling

The following labeling revisions are required:

1. Revise the claim "Inhibits bacteria growth" to read "Inhibits bacteria growth within the unit". Feature the claim in the same type size and type face as the claim "Filters and removes chlorine, sediment odors, detergent, color and turbidity."
2. Specify that the unit is to be used for municipally treated tap water.
3. Indicate that the unit is for home use or wherever the intended market for this product may be.
4. Include the claim "This product has been thoroughly tested for 2500 gallon lifetime to insure that the silver concentration in drinking water will never exceed the maximum level of 50 ppb allowed for potable water."
5. Specify a maximum flow rate of 2 gallons per minute.

6. Indicate to the user a means to determine when the unit, with a 2500 gallon lifetime, must be replaced. Since this unit processes all cold water from the tap rather than only cold water intended for drinking and cooking, a daily usage of about 27 gallons must be considered. This requirement would be fulfilled by including in the labeling such statements as "The total life of the unit is up to 2500 gallons of water, depending upon the quality and clarity of the tap water being processed. The unit is capable of treating all cold tap water everyday for about 3 or 4 months. When the flow rate diminishes substantially (less than 1/2 gallon per minute) or the gallonage limitation has been reached, the unit must be replaced."

Dorothy M Portner

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10/29/75

Efficacy Section

Efficacy and Ecological Effects Branch