

Conference

2-14-80

ICI

Bayeracil (new product, new
chemical for screening food use)

ICI representatives

EPA

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Eglen & Dykstra did original
tox data review -

Exchange of I & II of original
with a new vol I & II

Vol. I then VII

Replace I & II with new I & II

add VIII & IX

Get acc. # & gone to
Rudy

They will re-submit
the EUP request with
some additional info
covering control of chemical
waste in air in boxes.

When we receive this
will be the time to send
different Vol. to various
disciplines

PROPOSED 1980 BAQUACIL EUP PROGRAM OUTLINE

INTRODUCTION:

An Experimental Use Program designed to establish BAQUACIL as an acceptable swimming pool sanitizing agent was begun in 1979. The size of the pools used in the program were between 27,000 gallons and 201,000 gallons, and were of the municipal type. These pools were selected in order to conform with the requirements of the EPA. However, it is the intention of ICI Americas to promote BAQUACIL to the homeowner for use in private pools. It is for this reason that we propose the following extended EUP program.

Objectives

- (1) Verify the adequacy of labelling instructions for a BAQUACIL pool care program.
 - (A) Determine if homeowners can cope with the chlorine to BAQUACIL conversion procedure.
 - (B) Determine if homeowners will use the BAQUACIL test kit correctly.
 - (C) Determine BAQUACIL consumption rate in homeowner pools.
 - (D) Determine the extent of esthetic and operational problems in homeowner pools and develop solutions thereof.
 - (E) Verify compatibility of BAQUACIL with available supplemental chemicals in real use situation.

SCOPE:

Location 1

- 20 to 50 homeowner, outdoor pools, in-ground and above-ground with adequate filter systems
- location = Pasadena, CA, area
- ICI employee pools predominantly
- Approximate starting date = May 1
- Test running time = full season (to late Sept.)

- BAQUACIL required = 1,000 - 2,600 pounds
- Data collected
 - (A) Record of all chemicals added and pool maintenance performed
 - (B) Weekly check of BAQUACIL level and pH by test kit
 - (C) Water analyses = calcium hardness and alkalinity at beginning of season run by preselected local laboratory
 - (D) Record of weekly water appearance (clarity, color, algae)
 - (E) Record of any problems encountered

Location 2

- About 150 homeowner, outdoor pools, in-ground and above-ground with adequate filter systems
- Location = Phoenix, AZ
- Approximate starting date = June 1
- Test running time = full season (to late Sept.)
- BAQUACIL required = about 6,500 pounds
- Data collected = same as above

OTHER OPTIONAL LOCATIONS:

It is necessary that we recognize the possibility that pools may be needed in other states in order to get a fix on the influence of provincial variables. To this end, we propose that states such as Maryland, Delaware, Pennsylvania and New Jersey be included as optional states to be used if necessary.

- Product will be packaged in appropriate child-proof containers and stored in ICI Americas warehouse until dispensed to Pool Care participant centers for distribution to homeowner cooperators.
- The product will be reformulated prior to packaging (dye will be added as per confidential statement of formula).
- The extended EUP is expected to run into December of 1980.
- Unused material will be recovered by the permittee for suitable disposal (repackaging, distruction or exportation).

BAQUACIL MATERIAL BALANCE

<u>Mix</u>	<u>Pounds Imported</u>	<u>Importation Year</u>	<u>Pounds BAQUACIL Used - Pools</u>	<u>Pounds BAQUACIL Used - Lab</u>	<u>Pounds BAQUACIL on Hand</u>	<u>Pounds - CEL* BAQUACIL Exp Manufacture</u>
5889	2204	1978				
3051	220	1979				
3011	882	1979				
2577	<u>1102</u>	1979				
	4408		1240	82	3086	501
Total BAQUACIL now available 3086 + 501 Amount of BAQUACIL allowed under EUP-11 = 3,587 lbs. Amount of BAQUACIL imported under EUP-11 = 6,000 lbs. Amount of BAQUACIL still importable under EUP-11 = 4,408 lbs. Amount of BAQUACIL still importable under EUP-11 = 1,592 lbs.						
Total amount of BAQUACIL needed for extended EUP = 12,000 lbs. Amount of BAQUACIL now on hand = 3,600 lbs. Amount of additional BAQUACIL required = 8,400 lbs. Portion of the added BAQUACIL importable under EUP-11 = 1,500 lbs. Remaining BAQUACIL required for extended EUP = 6,900 lbs.						
Request Extended EUP to cover importation of					7,000 lbs.	

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