



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

September 29, 2004

Robert W. Gruber
Arch Chemicals, Inc.
1955 Lake Park Drive
Suite 250
Smyrna, GA 30080

Subject: **Chlorine Free Baquacil Swimming Pool Sanitizer and Algicide**
EPA Registration No. 1258-1263
Application Date September 9, 2004
Receipt Date: September 20, 2004

Dear Mr. Gruber:

This Acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

Proposed Notification:

- Remove Company Warranty Statement
- Change EPA Registration Number from 72674 (Avecia) to 1258 (Arch) Chemicals
- Change Name, Address, Trademark, Ownership and Phone Number from Avecia to Arch

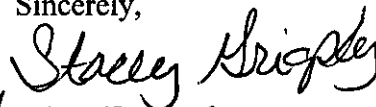
General Comment:

Based on a review of the material submitted, the following comment applies.

The notification is acceptable. A copy of the notification has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422 or Stacey Grigsby at (703) 305-6440.

Sincerely,



tl/ Adam Heyward
Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510C)

EPA	United States Environmental Protection Agency Washington, DC 20460	Registration Amendment X Other	OPP Identifier Number 378
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Application for Pesticide – Section I

1. Company/Product Number 1258-1263	2. EPA Product Manager E Mitchell	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <i>POOL SANITIZER AND ALGICIDE</i> Arch Chemicals/Chlorine Free Baguacil Swimming		PM# 32
5. Name and Address of Applicant (Include ZIP Code) Arch Chemicals, Inc. 1955 Lake Park Dr. Smyrna, GA 30080 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification – Explain Below.	<input type="checkbox"/> Other – Explain Below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Notification to;
 Remove company warranty statement
 Change EPA registration number from Avecia to Arch Chemicals
 Change name, address, trademark ownership and phone number from Avecia to Arch

NOTIFICATION
 Date Reviewed: *9-22-04*
 Reviewed By: *Stacy*

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
<i>* Certification must be submitted</i>		If "Yes" Unit Packaging wgt.	No. per Container	If "Yes" Packaging wgt.	No. per Container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper Glued <input type="checkbox"/> Stenciled					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Robert W Gruber	Title Regulatory Manager	Telephone No. (Include Area Code) 770-805-3214
Certification		6. Date Application Received (Stamp)
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law		
2. Signature	2. Title Regulatory Manager	
4. Typed Name Robert W Gruber	5. Date 9/9/04	



Arch
Chemicals

Arch Chemicals, Inc.
1955 Lake Park Drive
Suite 250

Smyrna, GA 30080
770.805.3214 • Fax: 770.805.3241

September 9, 2004

NOTIF
Office of Pesticide Programs (7510C)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, D.C. 20460

Subject: Notification for minor label changes

EPA File Symbol: 1258-1263

This notification is to make minor label changes resulting from the recent transfer of pesticide registrations from Number 72674 (Avecia) to Number 1258 (Arch Chemicals). The labels have been modified to include:

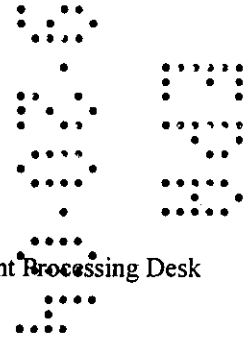
1. Removal of the warranty statement, which read:

NOTICE TO BUYER AND USER – LIMITED WARRANTY FROM AVECIA INC. (“Avecia.”)
warrants that this product conforms to the chemical description on the label, and that it is reasonably fit for the purposes stated on the label when used in accordance with Avecia’s instructions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions. Avecia will replace the product or refund the purchase price at your option should this warranty be breached within one year of sale. THE DURATION OF ANY IMPLIED WARRANTIES IS LIMITED TO ONE YEAR.

Some states do not allow limitations on how long an implied warranty lasts, so the above limitations may not apply to you. IN NO EVENT SHALL AVECIA BE LIABLE FOR ANY SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES, INCLUDING LOST PROFITS, and no person is authorized to alter the terms of Avecia’s warranty. Some states do not allow the exclusion or limitation of incidental or consequential damages, so the above limitation or exclusion may not apply to you. For warranty assistance, write Business Manager, BAQUACIL, Wilmington, DE 19850. This warranty gives you specific legal rights and you may have other rights which vary from state to state.

2. Change EPA registration number from Avecia to Arch.

3. Change name, address, trademark ownership and phone number from Avecia to Arch.



NOTIFICATION
Date Reviewed: 9-22-04
Reviewed By: B. Grigsby

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E. m.

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Even though notification is not necessary for company designation and EPA registration Number, this notification is being submitted to also include the removal of the Warranty statement.

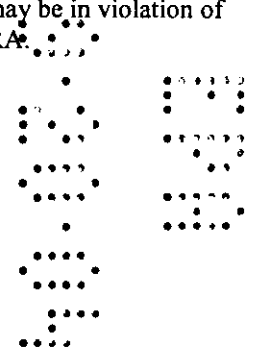
This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C., Sec. 1001 to willfully make any false statement to the EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to Enforcement action and penalties under sections 12 and 14 of FIFRA.

Please contact me with any questions.

Regards,



Robert W. Gruber
Regulatory Manager
770-805-3214
770-805-3241 fax
rwgruber@archchemicals.com



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Chlorine-free

Baquacil®

Swimming Pool Sanitizer and Algistat

ACTIVE INGREDIENT: POLY
(IMINOIMIDOCARBONYLIMINOIMIDOCARBONYLIMINOHEXAMETHYLENE HYDRO
CHLORIDE).....20%
INERT INGREDIENTS.....80%
TOTAL.....100%

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.
KEEP OUT OF REACH OF CHILDREN

NOTIFICATION
Date Reviewed: 12-22-04
Reviewed By: S.S. Taylor

WARNING

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 SWALLOWED

- Call a 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 a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

MEDICAL EMERGENCY INFORMATION CENTER

1-800-654-6911

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Net Contents: One Half Gallon (1.89 Liters)

EPA Reg. No. 1258-1263

If lot # contains an "A", EPA Est. No. is 058996-MO-001.

If lot # contains an "M", EPA Est. No. is 36209-NJ-01.

If lot # contains a "B", EPA Est. No. is 4091-TN-3

PRECAUTIONARY STATEMENTS. HAZARDS TO HUMANS AND DOMESTIC ANIMALS.

WARNING

CAUSES SUBSTANTIAL BUT TEMPORARY EYE INJURY.

HARMFUL IF SWALLOWED.

Do not get concentrate in eyes or on clothing. Avoid contact with skin. Avoid breathing vapor or mist. Wash thoroughly with soap and water after handling. Wear goggles or face shield when handling concentrate. Keep container closed. May cause allergic skin reactions.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not contaminate water by cleaning of equipment or disposal of wastes.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner other than for which it was intended. BAQUACIL can be used in both residential and public swimming pools and spas.

TREATING POOL

POOLS PREVIOUSLY TREATED WITH CHLORINATING CHEMICALS

Important – BAQUACIL SWIMMING POOL SANITIZER AND ALGISTAT (“BAQUACIL SANITIZER”) is incompatible with chlorinating chemical products. Consult your Authorized Dealer of BAQUACIL for information on balancing your pool water. Note: If the pool is a plaster pool, add 1 ¼ lbs. of BAQUACIL® METAL CONTROL per 10,000 gallons after the chlorine has been neutralized, and allow pump/filter to operate for 8-12 hours.

Check with chlorine test kit for free and combined chlorine prior to the beginning of neutralization. To destroy chlorine, add BAQUACIL® CHLORINE NEUTRALIZER per label directions or add 1 gallon of BAQUACIL® OXIDIZER (27% hydrogen peroxide) per 10,000 gallons of pool water. Filter overnight. Check with chlorine test kit. If free chlorine is detected, repeat neutralizer treatment.

FRESHLY FILLED AND DECHLORINATED POOLS

START UP WITH BAQUACIL

Note: If the pool water contains algae or is hazy, consult the problem-solving section of “The Pool Care Guide for BAQUACIL,” available from your Authorized Dealer of BAQUACIL.

- Backwash or clean pool filter. Check pool pH; adjust to 7.2–7.8 if necessary.
- Add BAQUACIL SANITIZER to give a content of 50 ppm (1/2 gallon product/10,000 gallons of pool water).
- After 24 hours, check pH and BAQUACIL SANITIZER concentration with BAQUACIL® TEST STRIPS and adjust if necessary.

NORMAL POOL ROUTINE

- Every week, check BAQUACIL SANITIZER concentration and pH.
- Maintain BAQUACIL SANITIZER concentration at about 50 ppm. If concentration falls 10 ppm or more, add a top-up dose. The level should not be allowed to drop below 30 ppm. For example, to raise the BAQUACIL SANITIZER level 10 ppm, add 1 pint per 10,000 gallons of water. Consult the booklet, “The Pool Care Guide for BAQUACIL,” for calculation instructions.

NOTE: BAQUACIL SANITIZER AND CHLORINE ARE INCOMPATIBLE. Refer to “The Pool Care Guide for BAQUACIL” for information on how to deal with accidental chlorination.

PROBLEM-SOLVING AND SUPPLEMENTAL POOL INFORMATION

Do not use in freestanding spas/hot tubs. Do not use in unpainted plaster pools previously exposed to metals which may cause staining. (See current “Pool Care Guide” for specific information.)

BAQUACIL is not compatible with many detergents and some supplemental algicides (such as those based on copper).

If algae development, cloudiness, or pool problems occur or additional information on water quality is desired, consult “The Pool Care Guide for BAQUACIL,” available from your Authorized Dealer of BAQUACIL.

TREATING POOLS ON THE BAQUACIL AUTOMATED DOSING SYSTEM.

To be used only with the Baquacil Automated Dosing System.

START-UP

1. Unscrew the child resistant cap (keep this cap for the possible off-season storage of chemical) and connect to appropriate feed line for the automated system.

2. **BAQUACIL Automated Dosing System** will deliver an initial dose of 64 oz per 10,000 gallons to the pool water to obtain an initial reading of 50 ppm.
3. After about 24 hours, take a water sample to your Authorized BAQUACIL Dealer for complete water analysis.

NORMAL POOL MAINTENANCE:

1. Once a week, check the CHLORINE-FREE CARE-FREE BAQUACIL AD™ AUTOMATED DOSING SYSTEM SANITIZER AND ALGISTAT concentration, using the BAQUACIL Test Strips.
2. To insure proper sanitization and protection, maintain your CHLORINE-FREE CARE-FREE BAQUACIL AD™ AUTOMATED DOSING SYSTEM SANITIZER AND ALGISTAT concentration level between 30 – 50 ppm.
3. Once a month, take a water sample to your Authorized BAQUACIL Dealer for complete water analysis.

END OF SEASON

Disconnect the CHLORINE-FREE CARE-FREE BAQUACIL AD™ AUTOMATED DOSING SYSTEM SANITIZER AND ALGISTAT container from system and replace child resistant cap. Store in a cool place, in upright position, away from direct sunlight and out of reach of children.

STORAGE AND DISPOSAL**PESTICIDE DISPOSAL**

Keep container closed when not in use. Store in original container in an area inaccessible to children.

PROTECT FROM FREEZING.

In case of a leak or spill, soak up with absorbent, such as sand, earth, or sawdust, and shovel into waste container. Remove waste to chemical waste area, and dispose of in accordance with local pollution regulations.

To dispose of excess product, securely wrap original container in several layers of newspaper and discard in trash.

CONTAINER DISPOSAL

Do not reuse container. To dispose of empty container, rinse thoroughly before discarding in trash. FOR INFORMATION ON SPILLS, CALL 1-800-654-6911.

BAQUACIL is a registered trademark of Arch UK Biocides Limited.

Made in U.S.A.

Arch Chemicals, Inc.
501 Merritt 7
P.O. Box 5204
Norwalk, CT 06856-5204

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For more information, visit our website at www.baquacil.com.
For product support, call 1-877-929-7945