

1258-1263

1-4-2008

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

January 4, 2008

Mark E. Burt, Ph. D.
Arch Chemicals, Inc.
1955 Lake Park Drive, suite 100
Smyrna, GA 30080

Subject: Product Name: Baquacil Swimming Pool Sanitizer and Algistat
EPA Registration Number 1258-1263
Application Date: 03-Dec-2007
Receipt Date: 06-Dec-2007

Dear Dr. Burt:

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

Proposed Notification

- Add responsible care symbol as an advisory statement
- Add marking statements
- Add advisory statements
- Revise label per Notice 2007-4

General Comments:

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

The subject application is acceptable, except for the following proposed notification request:

- Add a responsible care symbol as an advisory statement. The proposed symbol must submit as a label amendment.

A copy of the approved notification has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me by telephone at 703) 308-6422 or by e-mail at heyward.adam@epamail.epa.gov during the hours of 7:00 am to 4:00 pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,



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

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Arch Chemicals, Inc.

1955 Lake Park Drive
Suite 100
Smyrna, GA 30080
Tel: 770.801.6600

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Via Federal Express
December 3, 2007

Mr. Adam Heyward
Product Manager 34
Office of Pesticide Programs (7504P)
C/O Document Processing Desk (NOTIF)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Subject: Baquacil Swimming Pool Sanitizer and Algistat

- EPA Reg. No. 1258-1263
- Combined PR Notice 2007-4 Notification and PR Notice 98-10 Notification:
 - o To Revise Label to Comply With Container Regulations in Subpart H Container Labeling, §156.140
 - o To Add a Responsible Care Symbol as Advisory Statement
 - o To add optional marketing statements
 - o To add optional advisory statements

Dear Mr. Heyward:

Arch Chemicals, Inc. is submitting a combined PR Notice 2007-4 Notification and a PR Notice 98-10 Notification for the above subject project.

Please note that the batch number or lot number will be printed directly on the container.

The PR Notice 98-10 notification seeks to add optional marketing claims and Arch believes these may be added to the label via notification.

Additionally, Arch proposes to add optional advisory statements to the directions for use section. Arch believes that these items can also be added via notification.

Arch Chemicals, Inc.

1955 Lake Park Drive

Suite 100

Smyrna, GA 30080

Tel: 770.801.6600

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In support of this application for notification, enclosed are the following documents:

- A completed application for amendment (EPA 8570-1) form, with attached certification statements, as required by PR Notice 2007-4 and PR Notice 98-10.
- Two copies of the product labeling with additions in red print.

Thank you for your cooperation. Please contact me 770-803-2526 or by e-mail at meburt@archchemicals.com, if there are any questions. If I am not available, please contact John Hott at 770-598-7735.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark E. Burt". The signature is written in a cursive style with some flourishes.

Mark E. Burt, Ph.D.
Regulatory Manager



	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide - Section I

1. Company/Product Number 1258-1263	2. EPA Product Manager Adam Heyward	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Baquacil Swimming Pool Sanitizer and Algistat	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) Arch Chemicals, Inc. 1955 Lake Park Drive 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.)

Arch is submitting this notification per PR Notice 98-10 and PR Notice 2007-4 (see attached certification statements)
 PRIA Category: N/A (notification)
 PRIA Fee: N/A
 Contact: Mark E. Burt, phone 770-803-2526, e-mail, meburt@archchemicals.com.
 If I am unavailable call John Hott, phone 770-598-7735

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 <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package 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"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled <input type="checkbox"/> Other _____					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Mark E. Burt	Title Regulatory Manager	Telephone No. (include Area Code) (770) 803-2526
Certification 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.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Manager	
4. Typed Name Mark E. Burt	5. Date December 3, 2007	

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DRAFT EPA MASTER LABEL COPY

[All text in square brackets {AAA} is optional and may/may not be included on final label]
{All text in braces {AAA} is for information purposes and will not appear on final label}

**Chlorine-free
Baquacil®
Swimming Pool Sanitizer and Algistat**

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

SEE {SIDE} [BACK] PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.
KEEP OUT OF REACH OF CHILDREN

WARNING

{optional marketing claims}
[Step: 1]
[Chlorine-free Swimming Pool Sanitizer]

NOTIFICATION
Date Reviewed: 1-5-09
Reviewed By: [Signature]

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

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**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 inconsistent with its labeling. BAQUACIL[brand] can be used in both residential and public swimming pools and spas.

[For best results follow a weekly program with our [brand] System. Consult your authorized [brand] dealer for advice on the system that best suits your pool and your lifestyle]
[Take a pool water sample to your authorized [brand] dealer regularly for a detailed water analysis]

TREATING POOL

POOLS PREVIOUSLY TREATED WITH CHLORINATING CHEMICALS

Important – BAQUACIL[brand] SWIMMING POOL SANITIZER AND ALGISTAT (“BAQUACIL[brand] SANITIZER”) is incompatible with chlorinating chemical products. Consult your Authorized BAQUACIL[brand] dealer for information on balancing your pool water. Note: If the pool is a plaster pool, add 1 ¼ lbs. of BAQUACIL[brand]® 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 {correction of inaccuracy} chlorine prior to the beginning of neutralization. To neutralize chlorine, add BAQUACIL[brand]® CHLORINE NEUTRALIZER per label directions or add 1 gallon of BAQUACIL[brand]® OXIDIZER (27.5% hydrogen peroxide) {typo correction} 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[brand]

Note: If the pool water contains algae or is hazy, consult your Authorized [brand] Dealer for advice. {User is directed to the dealer and the following reference is deleted} ~~the problem-solving section of “The Pool Care Guide for BAQUACIL,” available from your Authorized Dealer of BAQUACIL.~~

- Backwash or chemically clean pool filter. Check pool pH; adjust to 7.2–7.8 if necessary.
- Add BAQUACIL[brand] 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[brand] SANITIZER concentration with BAQUACIL[brand]® TEST STRIPS and adjust if necessary.

NORMAL POOL ROUTINE

- Every week, check BAQUACIL[brand] SANITIZER concentration and pH.
- Maintain BAQUACIL[brand] 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[brand] SANITIZER level 10 ppm, add 1 pint per 10,000 gallons of water. Consult your authorized BAQUACIL[brand] Dealer, for calculation instructions.

Under NOTE: [brand] SANITIZER AND CHLORINE ARE INCOMPATIBLE.

Consult your authorized [brand] Dealer for information on how to deal with accidental chlorination.

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{User is directed to the dealer and the following reference is deleted} 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.

TREATING KIDDIE POOLS

1. Fill the pool with fresh water.
2. Add a dose of BAQUACIL[brand] SANITIZER. Use the chart below to calculate how much to add.
3. After one minute, test the water with BAQUACIL[brand] TEST STRIPS. The color should be in the 'OK' range.
4. After one week, drain or discard the water from the pool, scrub pool sides lightly with a soft cloth, rinse the pool and refill with fresh water. Add a fresh dose of BAQUACIL[brand] SANITIZER.

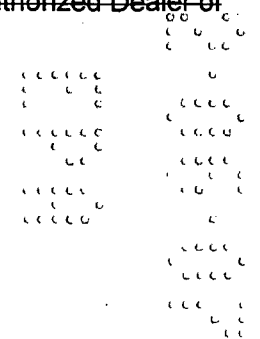
Pool volume In gallons	Amount of BAQUACIL[brand] SANITIZER to add		
	BAQUACIL[brand] SANITIZER in teaspoons	BAQUACIL[brand] SANITIZER in tablespoons	BAQUACIL[brand] SANITIZER in ounces
25	1	1/3	1/6
75	3	1	1/2
100	4	1 1/3	2/3
150	6	2	1
200	8	2 2/3	1 1/3
250	10	3 1/3	1 2/3
300	12	4	2
350	14	4 2/3	2 1/3

NOTES:

1. Grass and soil in the pool will make water cloudy. Minimizing the amount of soil and grass will help the water to remain clean and reduce the number of refills.
2. Heavy rain may dilute the sanitizer and allow bacteria to grow. After a heavy rain, check the sanitizer concentration with BAQUACIL[brand] TEST STRIPS. If the pool is still clear but Test Strip reads "Add", add 1/2 standard dose of sanitizer. Test water with test strip to ensure that sanitizer is within range. If the water is cloudy after a rain you should drain the pool and refill with fresh water.
3. If the water becomes cloudy, drain the pool and refill with fresh water.

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. (Consult with your authorized BAQUACIL[brand] dealer for specific information See current "Pool Care Guide" for specific information.) BAQUACIL[brand] 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- your Authorized [brand] [brand] dealer.



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TREATING SPAS OR HOT TUBS

Important-BAQUACIL[brand] SANITIZER is incompatible with chlorinating and brominating chemical products.

Start Up with BAQUACIL[brand] SANITIZER:

1. Remove chlorine or bromine source and disconnect leader {correct typo} feeder. Discontinue use of ionizers and electrochlorinators if present.
2. Drain existing water in spa.
3. Clean spa surface and filter.
4. Fill spa with water.
5. Have your Authorized Dealer of BAQUACIL[brand] [brand] SANITIZER check your water for proper water balance.
6. After water has been balanced, add BAQUACIL[brand] SANITIZER to give concentration of 50ppm (1oz. of product per 150 gallons of spa water¹).
7. Circulate water for 30 15 minutes{correct typo} , then check BAQUACIL[brand] SANITIZER concentration with BAQUACIL[brand] TEST STRIPS and adjust if necessary.

NORMAL SPA MAINTENCE

1. Every week, check BAQUACIL[brand] SANTIZER concentration and pH. Adjust if necessary.
2. The level of BAQUACIL[brand] SANITIZER is 30ppm² or less, add enough BAQUACIL[brand] SANITIZER to bring the level up to 50ppm. The spa's level of BAQUACIL[brand] SANITIZER should never be allowed to drop below 30ppm. To raise the BAQUACIL[brand] SANITIZER level 10ppm, add 0.2 oz³ per 150 gallons of spa water.

TREATING POOLS ON THE BAQUACIL[BRAND] AUTOMATED DOSING SYSTEM.

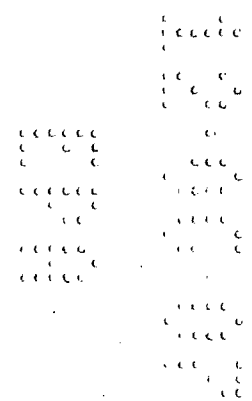
To be used only with the Baquacil[brand] Automated Dosing System.

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[brand] 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[brand] Dealer for complete water analysis.

NORMAL POOL MAINTENANCE:

1. Once a week, check the CHLORINE-FREE CARE-FREE BAQUACIL[brand] AD™ AUTOMATED DOSING SYSTEM SANITIZER AND ALGISTAT concentration, using the BAQUACIL[brand] Test Strips.
2. To insure proper sanitization and protection, maintain your CHLORINE-FREE CARE-FREE BAQUACIL[brand] 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[brand] Dealer for complete water analysis.



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END OF SEASON

Disconnect the CHLORINE-FREE CARE-FREE BAQUACIL[brand] 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.

CONTAINER DISPOSAL {Optional statements – usage depends on whether or not refillable or nonrefillable containers are used and whether or not product is packaged for household/residential use only}

{Nonrefillable container - household/residential use}

[Keep this product in its tightly closed container when not in use. Nonrefillable container. Do not reuse or refill this container. Rinse empty container thoroughly with water prior to disposal. Offer for recycling if available. Do not contaminate food or feed by storage or disposal or cleaning of equipment.]

{Refillable container – household/residential use}

[Keep this product in its tightly closed container when not in use. Do not contaminate food or feed by storage or disposal or cleaning of equipment. Refillable container. Refill this container with Poly(iminoimidocarbonyliminoimidocarbonyliminohexamethylene hydrochloride) only. Do not use this container for any other purpose. Rinse empty container thoroughly with water prior to disposal.]

{Nonrefillable container - non-household/residential use}

[Keep this product in its tightly closed container when not in use. Do not contaminate food or feed by storage or disposal or cleaning of equipment. Nonrefillable container. Do not reuse this container. Offer for recycling if available. Rinse empty container thoroughly with water prior to disposal.]

{Refillable container – non-household/residential use}

[Keep this product in its tightly closed container when not in use. Do not contaminate food or feed by storage or disposal or cleaning of equipment. Refillable container. Refill this container with Poly(iminoimidocarbonyliminoimidocarbonyliminohexamethylene hydrochloride) only. Do not use this container for any other purpose. Cleaning of this container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. Rinse empty container thoroughly with water prior to disposal.]

To dispose of empty container, rinse thoroughly before discarding in trash.

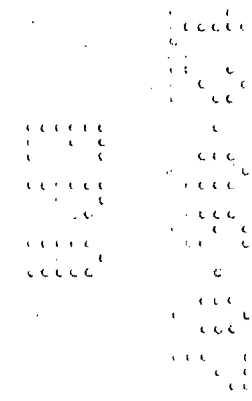
FOR INFORMATION ON SPILLS, CALL 1-800-654-6911.

BAQUACIL is a registered trademark of Arch UK Biocides Limited.

Arch Chemicals, Inc.
Smyrna, GA 30080

[[brand] System
Step 1: Sanitize
Step 2: Oxidize
Step 3: Add Algaecide]

[[brand] CDX System:
Step 1: Sanitize
Step 2: Oxidize



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Step 3: Add CDX]

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For more information, visit our website at [www.\[brand\].com](http://www.[brand].com).

For product support, call 1-877-929-7945

