



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

**October 1, 2004**

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

Subject: **Banquil Ultra Sanitizer & Fungicide**  
EPA Registration No. 1258-1265  
Application Dated 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

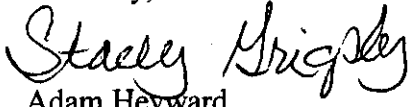
**General Comment:**

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,



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

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<b>EPA</b>	United States <b>Environmental Protection Agency</b> Washington, DC 20460	<b>Registration Amendment</b> <b>X Other</b>	OPP Identifier Number
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**Application for Pesticide – Section I**

1. Company/Product Number 1258-1265	2. EPA Product Manager E Mitchell	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <i>SANITIZER &amp; FUNGICIDE</i> <b>Arch Chemicals/Baquacil Ultra Swimming Pool</b>		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. <b>Expedited Review.</b> 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**

Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <b>X</b> Notification – Explain Below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application <input type="checkbox"/> Other – Explain Below.
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**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: *7-22-04*  
 Reviewed By: *Gruber/sby*

**Section - III**

<b>1. Material This Product Will Be Packaged In:</b>					
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	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* <b>Certification must be submitted</b>		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) 770-805-5214
<b>Certification</b> 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 _____	2. Title Regulatory Manager	
4. Typed Name Robert W Gruber	5. Date 9/9/04	

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Arch  
Chemicals

Arch Chemicals, Inc.  
1955 Lake Park Drive  
Suite 250

Smyrna, GA 30080  
770.805.3214 • Fax: 770.805.3241

September 9, 2004

Document Processing Desk

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: 1258-1265

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:

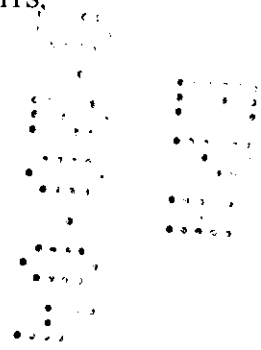
1. Removal of the warranty statement, which read:

**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.

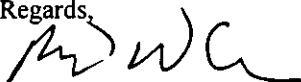


Even though notification is not necessary for company designation and EPA registration Number, this notification is being submitted to also include the removal of the Warranty statement.

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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Bromine-free, Chlorine-free

# Baquacil® Ultra Swimming Pool Sanitizer & Fungicide

Active Ingredient: Poly(iminoimidocarbonyliminoimidocarbonyliminohexamethylene hydrochloride) ..... 20%  
 Inert Ingredients ..... 80%  
 TOTAL.....100%

WARNING: KEEP OUT OF REACH OF CHILDREN.  
 See side panel for additional precautionary statements.

**NOTIFICATION**  
 Date Reviewed: 7-22-04  
 Reviewed By: S. Garcia by

FIGHTS TOUGH POOL PROBLEMS  
 WITH STAIN & SCALE CONTROL

PRECAUTIONARY STATEMENTS  
 HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

HARMFUL IF SWALLOWED, INHALED OR ABSORBED THROUGH THE SKIN. AVOID CONTACT WITH SKIN OR CLOTHING. AVOID BREATHING VAPOR OR MIST. CAUSES SUBSTANTIAL BUT TEMPORARY EYE INJURY. DO NOT GET IN EYES. WASH THOROUGHLY WITH SOAP AND WATER AFTER HANDLING. REMOVE CONTAMINATED CLOTHING AND WASH CLOTHING BEFORE REUSE. WEAR GOGGLES OR FACE SHIELD WHEN HANDLING CONCENTRATE. MAY CAUSE ALLERGIC SKIN REACTION.

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 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.

IF INHALED

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

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.

EPA Reg. No. 1258-1265  
 EPA Est. No. 4091-TN-3

Net Contents: 56 oz. (1.72 Liters)

ENVIRONMENTAL HAZARDS



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

**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.

**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 ULTRA is effective for residential and public swimming pools and spas.

**Converting From Chlorine**

If you are using chlorine in your pool, it is important to eliminate the chlorine from the pool since BAQUACIL ULTRA Swimming Pool Sanitizer and Fungicide ("BAQUACIL ULTRA Sanitizer") is incompatible with chlorinating chemicals. Follow these simple steps:

1. Make sure your water is properly balanced. Take a sample of your pool water to your Authorized BAQUACIL Dealer for a complete water analysis. Adjust as necessary following your dealer's recommendations.
2. Use a chlorine test kit to check for the level of free and combined chlorine in your pool.
3. A. If your pool water is clear, add BAQUACIL Chlorine Neutralizer per label directions. Filter overnight.  
B. If your pool water is cloudy or algae is present, add one gallon of BAQUACIL Oxidizer per 10,000 gallons of pool water. Filter overnight.
4. The next morning, check with your chlorine test kit for free and combined chlorine. If free chlorine is detected, repeat steps indicated above.

**Freshly Filled, Dechlorinated or BAQUACIL Pools**

To get started properly with BAQUACIL ULTRA Sanitizer, follow these steps:

1. Backwash or chemically clean your pool's filter with BAQUACIL Filter Cleaner. Check the pool's pH adjusting to a range between 7.2 - 7.8 if necessary.
2. Add BAQUACIL ULTRA System Start-Up following label directions.
3. Add BAQUACIL ULTRA Sanitizer at a rate of 58 oz. per 10,000 gallons of pool water to obtain an initial reading of 50 ppm. Filter overnight.
4. After 24 hours, use BAQUACIL ULTRA Test Strips to check the pool's pH and BAQUACIL ULTRA Sanitizer reading and adjust if necessary.

**Normal Pool Maintenance**

To properly maintain your pool with BAQUACIL ULTRA Sanitizer during the swimming season, follow these steps on a weekly basis:

1. Once a week, check the BAQUACIL ULTRA Sanitizer concentration, pH and total alkalinity in your pool.
2. Maintain your BAQUACIL ULTRA Sanitizer concentration between 30 and 50 ppm. To insure proper sanitization and protection, the level should never be allowed to drop below 30 ppm. To raise the BAQUACIL ULTRA Sanitizer concentration 10 ppm, add 14 oz. per 10,000 gallons of pool water. Review the weekly maintenance dosage chart found in your BAQUACIL ULTRA Pool Care Guide.
3. Every week, add one pouch of BAQUACIL ULTRA Oxidizer Increaser Tablets per 10,000 gallons of pool water.

**PROBLEM SOLVING AND SUPPLEMENTAL POOL INFORMATION**

Please remember that BAQUACIL ULTRA Sanitizer and chlorine-based chemicals are not compatible. If you accidentally add chlorine to your swimming pool, refer to the BAQUACIL ULTRA Pool Care Guide for troubleshooting techniques.

Do not use BAQUACIL ULTRA Sanitizer in unpainted plaster pools previously exposed to metals that may cause staining (see BAQUACIL ULTRA Pool Care Guide for specific information). Do not use in free standing spas or hot tubs. BAQUACIL ULTRA Sanitizer is not compatible with many detergents and some algicides (such as those based on copper). Always check with your Authorized Dealer for compatibility before adding a product that isn't labeled BAQUACIL or BAQUACIL ULTRA. If algae, cloudiness or pool problems develop consult your Authorized BAQUACIL Dealer.

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.baquacilultra.com](http://www.baquacilultra.com)  
For product support, call 1-877-929-7945.