

1258-1275

9/29/2004

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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: **A Breeze Solid PHMB**
EPA Registration No. 1258-1275
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:

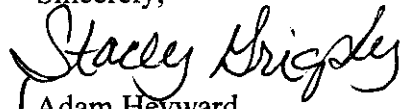
Based on a review of the material submitted, the following comment applies.

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

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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,



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
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Application for Pesticide – Section I

1. Company/Product Number 1258-1275	2. EPA Product Manager E Mitchell	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Arch Chemicals/A Breeze Solid PHMB	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"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> 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

Section - III

1. Material This Product Will Be Packaged In:			
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) _____
* Certification must be submitted 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"/> Paper Glued <input type="checkbox"/> 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 Robert W Gruber	Title Regulatory Manager	Telephone No. (Include Area Code) 770-895-3214
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)
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

NOTIFICATION
Date Reviewed: 9-22-04
Reviewed By: [Signature]

Subject: Notification for minor label changes

EPA File Symbol: 1258-1275

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.

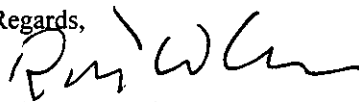
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Even though notification is not necessary for company designation and EPA registration Number, this notification is being submitted to also include the removal of the Warranty statement.

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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A-BREEZE SOLID PHMB

OPTION 1

A-BREEZE SANITIZER CARTRIDGE

[Descriptor for the Cartridge Label: Designed to fit A-BREEZE Feeders]

Net Contents: [One Cartridge – 3.7 lbs.]

OPTION 2

A-BREEZE SANITIZER TABLETS

Net contents (4 x 200g tablets or 800 g total)

NOTIFICATION

Date Reviewed: 9-22-04
Reviewed By: S Grigsby

Active Ingredient: Poly(iminoimidocarbonyliminoimidocarbonyliminohexamethylene hydrochloride).....96.3%

Inert ingredients.....3.7%

Total.....100.0%

KEEP OUT OF REACH OF CHILDREN

PRECAUTIONARY STATEMENT
Hazard to Humans and Domestic Animals

DANGER

Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes or on clothing. Wear protective eyewear such as goggles, face shield, or safety glasses. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or, using the bathroom. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after first 5 minutes, then continue rinsing. • Call a Poison Control Center or doctor for treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> • Call a Poison Control Center or doctor immediately for treatment advice. • Have person sip a glass of water if able to do so. • 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. • Probable mucosal damage may contraindicate the use of gastric lavage.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • 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.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
MEDICAL EMERGENCY INFORMATION CENTER 1-800-654-6911	

EPA Reg. No. 1258-1275
EPA Est. No. 075685-OH-001

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.

CONVERSION OF POOLS PREVIOUSLY TREATED WITH CHLORINE

DECHLORINATION

Important – **A-BREEZE SANITIZER** is incompatible with chlorinating chemical products.

1. Check free and combined chlorine levels with chlorine test kit prior to the beginning of neutralization.
2. Add **A-BREEZE CHLORINE NEUTRALIZER** per label directions to eliminate chlorine from pool water, and filter overnight.
3. Check chlorine levels with chlorine test kit. If free chlorine is detected, repeat step 2 of treatment.

Note: For plaster pools, add 1-¼ lbs (1 bottle) of **A-BREEZE METAL REMOVING AGENT** per 10,000 gallons of pool water after the chlorine has been neutralized, and allow pump/filter to operate for 8-12 hours.

If the pool water contains algae or is hazy, consult the problem-solving section of "The Pool Care Guide for **A-BREEZE**," available from your Authorized **A-BREEZE** Dealer. Backwash or clean pool filter. Check the pH level and adjust to 7.2-7.8 if necessary. Consult your Authorized **A-BREEZE** Dealer for information on balancing your pool water.

Once pool has been dechlorinated go to section for **START-UP FRESHLY FILLED AND DECHLORINATED POOLS**.

{This section of directions will only appear on A-BREEZE SANITIZER TABLETS}

START-UP FRESHLY FILLED AND DECHLORINATED POOLS

1. With pump on, add **A-BREEZE SANITIZER TABLETS** according to the chart below to provide a sanitizer level between 6 to 10 ppm. To add **A-BREEZE SANITIZER TABLETS**, cut each pouch and add tablet to pool skimmer.
2. Do not add anymore than 4 tablets per skimmer at any given time. For larger pools requiring more than 4 tablets initially add 4 tablets to the pool skimmer then add remaining tablets when original tablets are no longer visible. This may take about 6 –12 hours with pump running.

START-UP DOSAGE

Pool Volume (gallons)	No. of TABLETS for Start-up
7,500	1
10,000	2
12,500	2

15,000	3
17,500	3
20,000	4
22,500	4
25,000	5
27,500	5
30,000	6
32,500	6
35,000	7
37,500	7
40,000	8

2.3. After 24 hours, check pH, total alkalinity and sanitizer levels with **A-BREEZE TEST STRIPS**. If the sanitizer level is at or below 6 ppm, add **A-BREEZE SANITIZER TABLETS** to the skimmer according to the Top-Up Chart in the "ROUTINE POOL CARE" section below to bring the level to 6 to 10 ppm. Do not swim until sanitizer level reaches a minimum of 6 ppm.

START-UP FOR POOLS THAT ARE PRESENTLY USING A PHMB SANITIZER

1. Check pH, total alkalinity and sanitizer level with **A-BREEZE TEST STRIPS**.
2. If the sanitizer level is at or below 6 ppm add **A-BREEZE SANITIZER TABLETS** to provide a level of between 6 to 10 ppm. Do not swim until sanitizer level reaches a minimum of 6 ppm.
3. After 24 hours, re-check pH, total alkalinity and sanitizer level with **A-BREEZE TEST STRIPS**.
4. If the sanitizer level is at or below 6 ppm or less repeat steps 2 and 3.

ROUTINE POOL CARE

1. Each week, using **A-BREEZE TEST STRIPS** check pH, total alkalinity and sanitizer level.
2. Maintain sanitizer level between 6 to 10 ppm. If sanitizer level is at or below 6 ppm, add a top-up dose using **A-BREEZE SANITIZER TABLETS** according to the chart below to bring the level between 6 to 10 ppm. Turn the pump on when adding **A-BREEZE SANITIZER TABLETS**.

TOP-UP DOSAGE

Pool Volume (gallons)	No. of TABLETS for Top-up
7,500	1
10,000	1
12,500	1
15,000	1
17,500	2
20,000	2
22,500	2
25,000	2
27,500	2

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30,000	3
32,500	3
35,000	3
37,500	3
40,000	4

3. Once per month take a water sample to an Authorized A-BREEZE Dealer for complete water analysis.

{This section of directions will only appear on A-BREEZE SANITIZER CARTRIDGE}

START-UP FOR POOLS THAT ARE PRESENTLY USING A PHMB SANITIZER

1. Add the **A-BREEZE SANITIZER CARTRIDGE** to the **A-BREEZE FEEDER** and turn the pump on.
2. Check pH, total alkalinity and sanitizer level with **A-BREEZE TEST STRIPS**. If the sanitizer level is at or below 6 ppm add **A-BREEZE SANITIZER TABLETS** to provide a level of between 6 to 10 ppm. Do not swim until sanitizer level reaches a minimum of 6 ppm.
3. After 24 hours, re-check pH, total alkalinity and sanitizer level with **A-BREEZE TEST STRIPS**.
4. If the sanitizer level is at or below 6 ppm or less repeat steps 2 and 3.

ROUTINE POOL CARE

1. Each week, using **A-BREEZE TEST STRIPS** check pH, total alkalinity and sanitizer level.
2. Maintain sanitizer level between 6 to 10 ppm. If sanitizer level is at or below 6 ppm, add a top-up dose using **A-BREEZE SANITIZER TABLETS** according to the chart below to bring the level between 6 to 10 ppm. Turn the pump on when adding **A-BREEZE SANITIZER TABLETS**.

TOP-UP DOSAGE

Pool Volume (gallons)	No. of TABLETS for Top-up
7,500	1
10,000	1
12,500	1
15,000	1
17,500	2
20,000	2
22,500	2
25,000	2
27,500	2
30,000	3
32,500	3
35,000	3

37,500	3
40,000	4

3. Adjust the dial setting on the feeder to maintain a sanitizer level between 6 to 10 ppm.
4. If the **A-BREEZE SANITIZER CARTRIDGE** is empty, turn the pump off. Replace the empty **A-BREEZE SANITIZER CARTRIDGE** with a new one and turn on the pump.
5. If sanitizer level is higher than 10 ppm, turn off feeder until level drops below 10 ppm.
6. Once per month take a water sample to an Authorized **A-BREEZE Dealer** for complete water analysis.

Do not swim until sanitizer level reaches a minimum of 6 ppm.

POOL CLOSING

{This section of directions will only appear on A-BREEZE SANITIZER TABLETS}

1. Using **A-BREEZE TEST STRIPS** check pH, total alkalinity and sanitizer level.
2. Adjust sanitizer level to 10 ppm by adding a top-up dose using **A-BREEZE SANITIZER TABLETS**.
3. Close pool per pool manufacturer's recommendations.

PROBLEM-SOLVING AND SUPPLEMENTAL POOL INFORMATION

If algae development, cloudiness, or pool problems occur or additional information on water quality is desired, consult "The Pool Care Guide for **A-BREEZE**," available from your Authorized **A-BREEZE Dealer**.

A-BREEZE SANITIZER is incompatible with chlorinating chemical products, many detergents and some supplemental algicides (such as those based on copper).

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal

STORAGE

Store in a cool, dry place. Keep container closed when not in use. Store in original container in an area inaccessible to children.

DISPOSAL

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

A-BREEZE is a registered trademark of Arch Chemicals, Inc.

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.solidphmb.com

NOTE: Bracketed [] information is optional text/picture/diagram. Text separated by a comma (,) denotes – and/or-options. {Bracketed Text} is for administrative purposes only and will not appear on the printed label.