



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: **Endure**™  
EPA Registration No. 1258-1276  
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)

# Endure™

Active Ingredient:  
Sodium Tetraborate Pentahydrate... 100%

## KEEP OUT OF REACH OF CHILDREN

### WARNING

See precautionary statements and First Aid information on back panel.

Compatible with all pool sanitizer systems.  
Helps reduce algae growth.

**NOTIFICATION**  
Date Reviewed: 9-22-04  
Reviewed By: S. Grigby

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**WARNING.** Causes substantial but temporary eye injury. Harmful if swallowed. Do not get in eyes or on clothing. Wear goggles or face shield. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.

### 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 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.

#### 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.

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

### NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

Net Contents: 9 pounds

EPA REG. NO. 1258-1276  
EPA Est. No. 068058-IL-001

### STORAGE AND DISPOSAL:

Do not contaminate water, food or feed by storage or disposal. Keep this product dry in original tightly closed container until use. Store in a cool, dry, well ventilated area away from heat or open flame. Do not reuse container, but place in trash collection. Rinse thoroughly before discarding in trash. Do not store where children or animals may gain access.

**PHYSICAL OR CHEMICAL HAZARDS:**

Do not mix with other chemicals. Do not add through skimmer. Do not add to any dispensing device.

**ENVIRONMENTAL HAZARDS:**

Keep out of lakes, ponds or streams. Do not contaminate water by cleaning of equipment or disposal of wastes.

IN CASE OF MEDICAL EMERGENCY, CALL 1-800-654-6911.

**DIRECTIONS FOR USE:**

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

**FOR INITIAL APPLICATION IN POOLS SANITIZED WITH POOLIFE® OR POOL BREEZE® PRODUCTS:**

Backwash and clean filter. Balance your pool water and adjust pH between 7.2 - 7.6. Add 2 lbs. of ENDURE per 1,000 gallons of pool water by broadcasting the product over the surface of the pool with the pump running. This initial treatment should be added in three doses with one third of the required amount being added each application. Brush any undissolved product from the bottom of the pool. The pH of the pool water will rise as a normal reaction to the introduction of ENDURE. One hour after each application, adjust the pH to 7.2 - 7.6 with pH decriaser, according to label directions. Allow at least 8 hours between the applications of ENDURE. Do not add additional product until the pH is between 7.2 - 7.6 (NOTE: For every 2 pounds of ENDURE, approximately 1 pound of pH decriaser will be required for pH adjustment). Within 10 days, take a water sample to your dealer to test for water balance and to determine if an adequate amount of this product has been added.

**FOR INITIAL APPLICATION IN POOLS SANITIZED WITH BAQUACIL® POOL CARE SYSTEM:**

Backwash and clean filter. Balance your pool water and adjust pH between 7.2 - 7.6. Add 4 lbs. of ENDURE per 1,000 gallons of pool water by broadcasting the product over the surface of the pool with the pump running. This initial treatment should be added in three doses with one third of the required amount being added each application. The pH of the pool water will rise as a normal reaction to the introduction of this product therefore, one hour after each application, adjust the pH to 7.2 - 7.6 with pH decriaser, according to label directions. Allow at least 8 hours between the applications of ENDURE. Do not add additional ENDURE until the pH is between 7.2 - 7.6 (NOTE: For every 2 pounds of ENDURE, approximately 1 pound of pH decriaser will be required for pH adjustment). Within 10 days, take a water sample to your dealer to test for water balance and to determine if an adequate amount of this product has been added.

**FOR MAINTENANCE APPLICATION:**

This product is stable in pool water and not degraded by sunlight. The primary loss of product is through splash-out, backwashing and dilution from heavy rains. Therefore, once the initial application is made, minor and infrequent additions would be all that is required unless a substantial amount of water is drained from the pool.

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



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:                       
Reviewed By:                     

Subject: Notification for minor label changes

EPA File Symbol: 1258-1276

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.

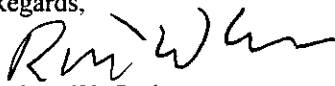
3. Change name, address, trademark ownership and phone number from Avecia to Arch.

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



<b>EPA</b>	United States <b>Environmental Protection Agency</b> Washington, DC 20460	<b>Registration Amendment X Other</b>	OPP Identifier Number
<b>Application for Pesticide – Section I</b>			
1. Company/Product Number 1258-1276	2. EPA Product Manager E Mitchell	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted	
4. Company/Product (Name) <b>Arch Chemicals/Endure</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 _____	
<b>Section - II</b>			
<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____		<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	
<input checked="" type="checkbox"/> Notification – Explain Below.		<input type="checkbox"/> "Me Too" Application <input type="checkbox"/> Other – Explain Below.	
<b>Explanation:</b> 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			
<b>NOTIFICATION</b> Date Reviewed: _____ Reviewed By: _____			
<b>Section - III</b>			
<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			
<b>Section - IV</b>			
<b>1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)</b>			
Name Robert W Gruber		Title Regulatory Manager	Telephone No. (Include Area Code) 770-805-3214
<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 <b>(Stamped)</b>
2. Signature		2. Title Regulatory Manager	
4. Typed Name Robert W Gruber		5. Date 9/9/04	