

January 30, 2003

Ms. Kristin M. Miller
Regulatory Affairs Specialist
Buckman Laboratories, Inc.
1256 N. McLean Blvd.
Memphis, TN 38018

Subject: Amendment per PR Notice 2001-1
EPA Registration No. 1448-378
Application dated December 6, 2002

Dear Ms. Miller:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the following comments:

Proposed Amendment

- revised labeling

Label Comments:

The following format, per Label Review Manual should be used for revision.

1. The percents must be aligned by the decimal point in the Ingredient Statement.
2. The Keep Out of Reach of Children statement and the Signal Word, Caution must be placed below the Ingredient Statements.
3. The Precautionary Statement heading must be placed above the Precautionary Statements. The Precautionary Statement heading must be displayed as follows:

Precautionary Statement
Hazardous to Humans and Domestic Animals
Caution

- 4. The "Storage and Disposal" statement must read :

Storage and Disposal

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

- Pesticide Storage...
- Pesticide Disposal...
- Container Disposal...

General Comments:

Submit three (3) copies of your final printed labeling bearing the revision stated above. A copy will be stamped and returned for your record.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422, or Lisa McKelvin at (703) 308-7496.

Sincerely,



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

BUSAN 1303

BUCHAN is a registered trademark.

KEEP OUT OF REACH OF CHILDREN

CAUTION

Precautionary Statements

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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 the first 5 minutes, then continue rinsing eye. - Call a poison control center or doctor for further treatment advice.
If on Skin, Clothes	<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 for treatment advice.
If Ingested	<ul style="list-style-type: none"> - 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	<ul style="list-style-type: none"> - 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.

HOT LINE NUMBER

Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may also contact 901-278-0330 or 1-800-BUCKMAN for emergency medical treatment information.

CAUTION: Harmful if swallowed. Avoid breathing vapors. Avoid contact with skin, eyes, or clothing.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

**ACCEPTED
with COMMENTS
EPA Letter Dated:**

JAN 30 2003

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 1448-378**

ACTIVE INGREDIENTS:	
Poly[oxyethylene(dimethylimino)ethylene(dimethyl- imino)ethylene dichloride].....	30.0%
INERT INGREDIENTS:	70.0%
TOTAL	100.0%

Storage and Disposal

Do not contaminate water, food, or feed by storage or disposal.
STORAGE: Do not stack more than four drums high. Leaking or damaged drums should be placed in overpack drums for disposal. Spills should be absorbed in sawdust or sand and disposed of in a sanitary landfill. Keep container closed when not in use.
PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticides, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.
CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

Manufactured by **Buckman Laboratories, Inc.**
1256 North McLean Blvd., Memphis, Tennessee 38108, USA
(901) 278-0330 or 1-800-BUCKMAN

EPA Est. No.	1448-TN-1	Net contents are marked on the container.
EPA Reg. No.	1448-378	
Product Weight	8.9 lbs/gal 1.07 kg/l	

HMS / NPCA Ratings			Last Revision
Health	1	Flammability 1	12/6/2002
		Reactivity 1	

Directions for Use
It is a violation of Federal law to use this product in a manner inconsistent with the label.

This product, if properly used in conjunction with chlorine, will control the growth of algae and bacteria only with the Purification System(TM) chemical delivery system. For maximum effectiveness, use the Purification System(TM) chemical delivery system.

GENERAL INFORMATION: The pump, filter, time clock, and Purification System are required for proper pool operation. For best results, make sure the pump and filter are operating properly and the sanitizer level is maintained.

Always check the sanitizer level using fresh reagents. Old reagents can give false readings.

This product is compatible with those chemicals normally used to treat swimming pools. Use the recommended amounts of chemicals normally required to keep a pool in safe sanitary condition and avoid over-chlorination.

Effective in both acid and alkaline pH, this product is designed to be used in pools with automatic chlorinators. It may reduce the amount of those chemicals normally required. However, DO NOT MIX WITH LIQUID CHLORINE.

SYSTEM START-UP: For pools having visible algae growth, brush walls, floors, and stairs. Use a sanitizer test kit with fresh reagents. If sanitizer level is outside of the desired range, adjust according to instructions for any required adjustments.

POOL CAPACITY: The factory setting on the Purification System allows a 20,000-gallon pool to dispense 32 ounces equally over approximately 30 days. The feeder is designed to dispense 32 ounces of sanitizer per week. If your equipment or filtration time is different, slight adjustments may be necessary. Instructions refer to the owner's manual that accompanied the Purification System.