3432-64 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 1 4 1998

Al Pastore **Technical Director** N. Jonas & Co., Inc. 4520 Adams Circle Bensalem, PA 19020

Subject: Sildate Non-Chlorine Disinfectant EPA Registration No. 3432-64 Notification Per PR-Notice 95-2

Dear Mr. Pastore:

This will acknowledge receipt of your notification for the (removal to the spa directions and spa references from our pool size package) provisions FIFRA section 3@9. Based on a review of the submitted material, the following comment apply.

This application is acceptable and has been made a part of the records for this file.

If you have any question concerning this letter please contact Drusilla Copeland at (703) 308-6224.

Sincerely,

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

| CONCURRENCES | | | | | | | | |
|----------------------|---------|-----|--|------|--|--|--------------------|--------------|
| SYMBOL | NME | | | | | | | |
| SURNAME | ELKASSA | ANY | | | | | | |
| DATE | 4/14/96 | | | | | | | ************ |
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Wanda Y. Mitchell
Notification Coordinator
US EPA 401 M St.
Regulatory Management Branch II
Antimicrobial Division (7510W)
Washington, DC 20460-0001

3/27/98

Subject:

Sildate Disinfectant (EPA Reg No. 3432-64), Label Notification

Dear Ms Mitchell:

I have enclosed a label change notification for SILDATE NON-CHLORINE DISINFECTANT #3432-64.. Our Representative at TAS-ENVIRON has spoken with Mr. Brennis concerning this notification, we have used the format that he has suggested. Please accept this letter as explanation under Section II of the enclosed form

On July 1st 1997 a label amendment was accepted for this product, I have enclosed a copy of the acceptance letter for your convenience. The label includes directions for use in both swimming pools and spas.

The purpose of this notification is for the removal of the spa directions and spa references from our pool size package. The size of the bottle is inappropriate for dispensing product at the rate of 1.5 oz to 3.0 oz which corresponds to 250 gal to 500 gal spas. In addition, the amount of product in the pool size package could easily last a home owner over two years. this would exceed the time of our stability studies.

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A copy of our master label is enclosed, I have highlighted the changes. There are no changes to the dosage, concentration or method of application. The Precautionary statements, Ingredient statement, Signal words, Storage and disposal statement, as well as directions for swimming pools remain unchanged.

We plan to produce a smaller size package more appropriate for spa use and include the spa directions.

If you have any questions please call me at 800-523-6533.

Sincerely,

Al Pastore Tech. Dir. ACCEPTED

1 1997

MASTER LABEL

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesficide, registered under FPA Reg. No. 34-32-6

FRONT LABEL

Sildate

THE NEW WAVE IN CHLORINE - FREE SWIMMING POOLS, SPAS, HOT TUBS AND WHIRLPOOLS.

NON-CHLORINE DISINFECTANT AND GERMICIDE FOR SWIMMING POOLS, SPAS, HOT TUBS AND WHIRLPOOLS.

ACTIVE INGREDIENT:

SILVER OXIDE II (AgO) 2.0% INERT INGREDIENTS.......98.0 % 100.0 %

> CONTAINS 2.67 oz SILVER OXIDE II, EQUIVALENT TO 2.33 oz SILVER AS ELEMENTAL PER GALLON.

F P A REG. # 3432-64

E.P.A. EST. # 3432-PA-1

NO SCALE FORMING MINERALS OR DISCOLORING AGENTS. THIS PRODUCT WILL NOT CAUSE FOAMING, ODORS, OR IRRITATIONS.



KEEP OUT OF REACH OF CHILDREN

CAUTION:

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

NET CONTENTS: 2 QUARTS (64 FL. OZ)

MFD. BY N. JONAS & CO., INC. 4520 ADAMS CIRCLE **BENSALEM PA 19020** MASTER LABEL

BACK LABEL

SILDATE Disinfectant is compatible with those chemicals normally used to treat swimming pools and Spas. It is effective at both acid and alkaline pH. SILDATE Disinfectant can be used in swimming pools and spas treated with chlorinating or brominating products. However, do not mix SILDATE Disinfectant with concentrated dry or liquid chlorinating products.

THIS PRODUCT IS USED TO KEEP BACTERIA UNDER CONTROL IN SWIMMING POOLS, SPAS, HOT TUBS AND WHIRLPOOLS

* Odor Free * Non-Staining

* Non-Sudsing

* Does not upset pH

* Safe for all pool surfaces

* Compatible with all pool chemicals

DIRECTIONS FOR USE IN SWIMMING POOLS

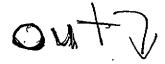
IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH IT'S LABELING.

To start up a new pool or when refilling a pool, add 2 QTS. SILDATE DISINFECTANT per 10,000 gal. water. Add Sildate Disinfectant to the pool through the skimmer. After Sildate Disinfectant has circulated for 15 min. add Energize at the rate of 1 lb per 10,000 gal swimming pool water. ENERGIZE is a necessary product for the complete activation of Sildate Disinfectant.

There is no pretreatment required for a pool previously treated with chlorinating products. Add 2 QTS. Sildate Disinfectant and one pound ENERGIZE for each 10,000 gallons of swimming pool water.

The addition of 2 QTS. Sildate and one pound Energize per 10,000 gal pool water will establish a Sildate Disinfectant residual of approximately 1.0 ppm. If the pool volume is not known add enough Sildate Disinfectant to establish a 1.0 ppm. residual. Your professional pool dealer will be able to test for this residual. Have the pool tested each week to insure that the proper amount of Sildate Disinfectant is present. if it should fall below 1.0 ppm add enough Sildate Disinfectant to adjust the level to 1.0 ppm.

Each week and after rain, or heavy use, add one pound ENERGIZE for each 10,000 gallons of water.



DIRECTIONS FOR SPA USE

To start up a new SPA or when refilling a SPA, add 3.0 fl. oz SILDATE DISINFECTANT per 500 gal. water. Add SILDATE DISINFECTANT to the spa in front of a return. After SILDATE DISINFECTANT has circulated for 15 min. add SILDATE Energize at the rate of 2 oz per 500 gal spa water. SILDATE ENERGIZE is a necessary product for the complete activation of SILDATE DISINFECTANT.

There is no pretreatment required for a spa previously treated with chlorinating or brominating products. Add 3.0 fl oz. Sildate Disinfectant and 2.0 oz SILDATE ENERGIZE for each 500 gallons of spa water.

The addition of 3.0 fl oz. SILDATE DISINFECTANT and 2.0 oz SILDATE ENERGIZE per 500 gal spa water will establish a SILDATE DISINFECTANT residual of approximately 1.0 ppm. If the volume is not known add enough SILDATE DISINFECTANT to establish a 1.0 ppm. residual. Your professional spa dealer will be able to test for this residual. Have the spa tested each week to insure that the proper amount of SILDATE DISINFECTANT is present. if it should fall below 1.0 ppm, add enough SILDATE DISINFECTANT to adjust the level to 1.0 ppm.

Each week, and after each use, add 4.0 oz SILDATE ENERGIZE for each 500 gallons of water.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

While classified as non-irritating, product may irritate eyes in the concentrated form. Do not get into eyes, on skin, or on clothing, avoid contamination of food.

STATEMENT OF PRACTICAL TREATMENT: If in eyes, immediately flush with water for at least 10 minutes. if on skin, wash thoroughly with water. Wash contaminated clothing before reuse.

PHYSICAL AND CHEMICAL HAZARDS

Mix only with water. Do not add this product to any dispensing device containing remnants of any other product. Do not allow contact with any reducing agents, organic matter, or ammonia.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance to 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 into sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the E.P.A.

STORAGE:

Store in a cool dry place.

CONTAINER DISPOSAL:

Rinse empty container thoroughly and discard in trash.

Made in U.S.A.