

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460**FILE COPY****Office of Pesticide Programs**

December 11, 2008

Mark Jernigan
Bio-Lab, Inc.
P.O. Box 300002
Lawrenceville, GA 30049-1002Subject: Alpha Initiator
EPA Reg. No.: 5185-400
Application Dated: November 20, 2008
Receipt Dated: November 24, 2008

Dear Mr. Jernigan:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA Section 3(c)9..

General Comments

Based on a review of the material submitted, the following comments apply:

This notification to add a "BioGuard Care System" graphic to the proposed label is acceptable. A copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6345.

Sincerely,

A handwritten signature in black ink, appearing to read "Wanda Henson".

Wanda Henson
Product Reviewer - Team 32
Regulatory Management Branch II
Antimicrobials Division (7510P)



United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 5185-400	2. EPA Product Manager E. Mitchell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Bio-Lab, Inc. / Alpha Initiator	PM# 32	
5. Name and Address of Applicant (Include ZIP Code) Bio-Lab, Inc. PO Box 300002 Lawrenceville, GA 30049-1002 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

Amendment - Explain below. Final printed labels in response to Agency letter dated _____
 Resubmission in response to Agency letter dated 11/5/08 "Me Too" Application.
 Notification - Explain below. Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Fee Determination: Fee Category - Not Applicable (Notification) mark.jernigan@chemtura.com
 Notification to add additional marketing statements. Per PR Notice 98-10, Section II, (Labeling Notifications), Part D (Other Revisions).
 Please see attached page for certification. (In response to EPA letter, a draft of the front panel is included to illustrate how the BioGuard Care System statements will be used on the label. Note that the text we request to add is to emphasize that the product is a sanitizer. Please refer to cover letter for additional details.)

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" Package wgt. No. per container

3. Location of Net Contents Information
 Label Container

4. Size(s) Retail Container

5. Location of Label Directions
 On label

6. Manner in Which Label is Affixed to Product
 Lithograph Paper glued
 Stenciled Other _____

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Mark Jernigan	Title Federal Registration Manager	Telephone No. (Include Area Code) 678-502-4149
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Certification
 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.

2. Signature 	3. Title Federal Registration Manager	6. Date Application Received (Stamped)
4. Typed Name Mark Jernigan	5. Date 11/20/08	

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A Subsidiary of Great Lakes Chemical Corporation

November 20, 2008

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

**Re: Alpha Initiator
EPA Registration No.: 5185-400
Response to EPA Letter Dated November 5, 2008**

Dear Sir/Madam:

Please process the enclosed notification for the above referenced product.

The purpose of this notification is to:

Add two optional marketing claims to the front panel. The proposed changes are marked on the attached label (located on page 3).

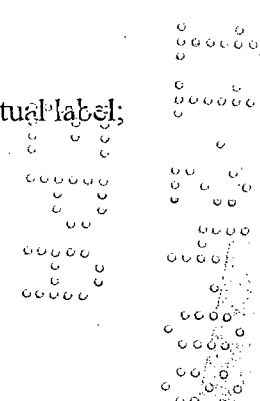
EPA's letter of November 5th states *"It is not clear if the BioGuard Care System is a separate product. The label identifies it as a sanitizer, is it providing additional sanitization, shock and algacide benefits to the Alpha Initiator."* The BioGuard Care System is a programmed approach to swimming pool care that involves the use of sanitizer, shock, and algicide. Please note that within the marketing statement we requested to add, only the "Sanitizer" has an "X" in front of it to denote that this product is a sanitizer. To illustrate how this marketing phrase will be used, please refer to the draft label enclosed (BioGuard Maintain Silk Smart Sticks is an additional brand name for Alpha Initiator). Note that an inverted triangle (which replaces the "X" in the Word document) is placed over the "Sanitizer" to allow consumers to readily identify the purpose of this product. Accordingly, other swimming pool products in our line that are shocks and algicides would be appropriately marked in a similar manner with a "BioGuard Care System." graphic to make it easy for consumers to identify the purpose of each product.

Enclosed are:

1. Application for Pesticide (EPA Form 8570-1);
2. Draft front panel to illustrate how proposed text would be included with actual label;
3. EPA letter of November 5, 2008 for reference;
4. Notification Certification Statement; and
5. Proposed label with changes marked.

Bio-Lab, Inc.
P.O. Box 300002
Lawrenceville, GA 30049-1002

tel: (678) 502-4000



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If you have any questions, please call me at 678-502-4149 or mark.jernigan@chemtura.com.

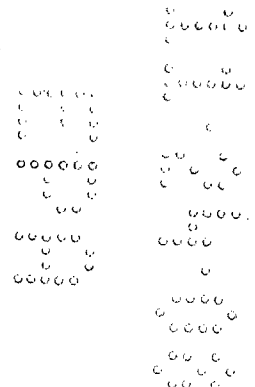
Thank you for your attention to this matter.

Sincerely,



Mark Jernigan
Federal Registration Manager

Enclosures



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EPA Registration Number: 5185-400

Product: Alpha Initiator

Application for Pesticide dated: November 20, 2008

Section - II

Explanation (Continued)

Notification of additional marketing statements per PR Notice 98-10, Section II (Labeling Notifications), Part N (Other Revision).

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 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.

Mark Jernigan
11/20/08

DRAFT



maintain silk smart sticks

multi-functional chlorinating stick

**Kills Bacteria and Algae
With SilkGuard®**

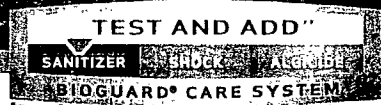
- Makes water soft and smooth
- Reduces scale formation
- Protects pool equipment for longer life

**Featuring SmartGuard®
Technology**

**Ideal for Use with BioLab®
UV System**

With SunShield®

- Protects chlorine from sunlight, so you use less



ACTIVE INGREDIENT:
 Dichloro-s-triazinetrione 92.91%
 OTHER INGREDIENTS: 6.14%
 TOTAL INGREDIENTS: 99.05%
 Each stick weighs approximately 1/2 lb.

NET WT. 8 LBS. (3.6 Kg)

* Please refer to instructions for use.
KEEP OUT OF REACH OF CHILDREN
DANGER See back panel for first aid statement and additional precautionary statements
 BIO-LAB, INC. P.O. Box 300002, Lawrenceville, GA 30049 USA

*Requested
addition via
not. fixation*

DRAFT

front panel for EPA Reg. # 5185-400

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