

5185-400

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

Office of Pesticide Programs

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

APR - 2 2009

**FILE COPY**

Subject: Alpha Initiator  
EPA Reg. No.: 5185-400  
Application Dated: December 1, 2008  
Receipt Dated: December 3, 2008

The labeling for the product referred to above submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended (FIFRA) is acceptable with the comment/condition listed below.

1. The claim "BIOGUARD ALPHA INITIATOR with SmartGuard and SilkGuard are unique and highly effective as a pool [chlorinating] water sanitizer" must be changed to read "BIOGUARD ALPHA INITIATOR with SmartGuard and SilkGuard is unique and effective as a pool [chlorinating] water sanitizer."
2. The "Initial Start-Up" directions for use both the Stabilizer 100 and Stabilizer are bracketed as optional. The "Stabilizer" term is not optional, therefore, you must insert the word "or" between the brackets.
3. The statements " BioGuard has a wide variety of products that are required to maintain a high quality swimming environment." includes both a heightened efficacy claim and an indirect comparative claim which are unacceptable.

**General Comments**

The submitted data to support the Description of Formulation Process for this product is acceptable.

The Antimicrobials Division is revisiting the subject of Category I placement of the First Aid statement on the label. In the interim we will allow Bio-Lab to place the First Aid statement on the back as long as "See [back] [side] panel for First Aid and additional precautionary statements" appears on the front panel.

A stamped copy of the labeling accepted with conditions is enclosed. Submit one copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

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

Sincerely,

*for Wanda Henson,*

Emily H. Mitchell  
Product Manager - Team 32  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

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{All text in brackets [xxx] is optional and may or may not be included on a final label.}  
{All text in braces {xxx} is administrative and will not appear on a final label.}

**ALPHA INITIATOR**

ACTIVE INGREDIENT:  
Trichloro-s-triazinetrione 93.9%  
OTHER INGREDIENTS: 6.1%  
TOTAL INGREDIENTS: 100.0%  
[(Each stick weighs approximately 1/2 lb.)]

**KEEP OUT OF REACH OF CHILDREN  
DANGER**

See [back] [side] panel for First Aid and additional precautionary statements.

BIO-LAB, INC.  
PO Box 300002  
Lawrenceville, Georgia 30049

EPA REG. NO. 5185-400  
EPA EST. NO. 5185-GA-1

NET WEIGHT: {as indicated on container}

[Made in USA]

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with COMMENTS  
EPA Letter Dated:

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Under the Federal Insecticide,  
fungicide, and Rodenticide Act as  
amended for the pesticide,  
registered under EPA Reg. No. 5185-400

- [SPECIFICALLY FORMULATED FOR USE IN SKIMMERS]
- [Swimming Pool Sanitizer]
- [Gentle on equipment and liners]
- [Super convenient to use]
- [Contains SmartGuard® Chlorine Protector]
- [with SmartGuard®]
- [with SmartGuard® and SilkGuard®]
- [Chlorinating sticks for once-a-week skimmer application.]
- [Step 1] *{This is to advise consumers that this product is Step 1 of a 3 step program to keep their swimming pool water clean.}*
- [Kills bacteria]
- [Kills algae]
- [Inhibits Algae]
- [[With SilkGuard®] prevents corrosion & metal staining, reduces scale formation, softens water]
- [Slow-Dissolving Sanitizer]
- [Controlled dissolving Chlorinating Sanitizer]
- [Controls Bacteria and Algae]
- [Controls Algae]
- [Kills Bacteria and Controls Algae]
- [Kills Bacteria and Algae]
- [With built in scale preventative and sunlight protector]
- [With built in corrosion preventative and sunlight protector]
- [With built-in metal stain inhibitor, scale preventative, water softener and sunlight protector]
- [With built-in Sunlight Protector]
- [With SUNSHIELD® Protects chlorine from sunlight, so you use less]
- [With built-in metal stain inhibitor, scale preventative, water softener]
- [Helps prevent corrosion & metal staining]
- [Reduces Scale Formation]
- [Makes water soft and smooth]
- [Softens Water]
- [Protects pool equipment for longer life]
- [Multifunctional Chlorinating Stick]
- [Compound action chlorinating stick]
- [Long lasting multifunctional chlorinating stick]
- [Once a week skimmer application]
- [Lasts one week\*]
- [Add once a week\*]
- [Once-A-Week\*]
- [\*use per label directions] *{or}* [\*Approximate addition rate. Please refer to directions for use.]
- [Once a week sanitizer]
- [Skimmer applied Chlorinating Stick [with SilkGuard®]]
- [[SilkGuard®] Prevents corrosion & metal staining, reduces scale formation, softens water]
- [With SilkGuard®]
- [Featuring SilkGuard® Technology]

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Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. **5185-400**

- [Featuring SmartGuard<sup>®</sup> Technology]
- [Featuring SmartGuard<sup>®</sup> and SilkGuard<sup>®</sup> Technology]
- [Maintains Brilliantly Clear Water]
- [Sanitizer of choice for BioLab UV system]
- [Ideal for use with BioLab UV system]
- [Suitable for use with BioLab UV system]
- [Compatible with BioLab UV system]
- [BioLab UV system approved.]
- [Use Alpha Initiator with BioLab UV system]
- [Maintain] {Designates that this product is part of maintenance line of products}
- [[With SmartGuard<sup>®</sup>,] chlorinating sticks do not dissolve when pump is off]
- [SmartGuard<sup>®</sup> extends life of chlorinating stick for weekly skimmer application]
- [SilkGuard<sup>®</sup> softens water and coats metal surfaces to protect against rusting and metal staining]
- [SilkGuard<sup>®</sup> binds hard water components, reducing scaling]
- [[Sunlight protector][Sunshield<sup>®</sup>] protects chlorine from sunlight so you use less product than with unstablized chlorines such as liquid bleach or calcium hypochlorite]
- [Sanitizes]
- [BioGuard Care System]
- {The "BioGuard Care System" below may be placed on the label to allow easy product identification by consumers.}
- [BioGuard Care System ( X ) Sanitizer ( ) Shock ( ) [Algicide][Algaecide]]

Our Ingredients:	What They Do:
Chlorine	Sanitizes, Kills Bacteria, Controls Algae
[Sunlight Protector] [-] [SUNSHIELD <sup>®</sup> ]	Protects chlorine from sunlight so you use less product than with unstablized chlorines such as liquid bleach or calcium hypochlorite.
[SilkGuard <sup>®</sup> ]	Softens water and coats metal surfaces to protect against rusting and metal staining. Binds hard water components, reducing scaling.
[SmartGuard <sup>®</sup> ]	Extends life of chlorinating stick for weekly skimmer application. Chlorinating sticks do not dissolve when pump is off.

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{To maintain brand segmentation, two sets of marketing statements are provided to maintain separate brand identity. One of the following Options will be used on the label.}

{Optional marketing paragraph A}

[BioGuard® has a wide variety of products that are required to maintain ~~high quality swimming environments~~. These products are designated as "Maintain".]

BIOGUARD® ALPHA INITIATOR with SmartGuard® and SilkGuard® are unique and ~~highly~~ effective as a pool [chlorinating] water sanitizer. SmartGuard® regulates the dissolving rate of ALPHA INITIATOR extending sanitizing power and controlling performance during application. SilkGuard makes water soft and smooth at the same time protecting your equipment and pool from scale, corrosion and stains due to corrosion.

[For best results follow the BioGuard Once-A-Week Three [Part] [Step] System;  
Weekly Add:

1. ALPHA INITIATOR with SilkGuard® to sanitize your pool.
2. Shock your pool with [a shock product] [BioGuard® Smart Shock] [or] [BioGuard® Easy Shock and Swim] [or] [BioGuard® BurnOut® Extreme] [or] [BioGuard® BurnOut® 35].
3. Prevent algae with BioGuard® Back Up or BioGuard® Algae All 60.]

[The BioGuard® Care System has three important parts that help you maintain crystal blue sparkling water.

- A sanitizer to control bacteria
- A shock to destroy contaminants
- A preventative [algicide][algaecide] to stop algae before it starts

All parts of the BioGuard Care System are vital to achieve beautiful water.]

[Alpha Initiator] {or} [This product] should be used as a maintenance sanitizer when using the BioLab UV system].

{Optional marketing paragraph B}

[BioGuard® has a wide variety of products that are required to maintain ~~high quality swimming environments~~. These products are designated as "Maintain".]

BIOGUARD® ALPHA INITIATOR with SilkGuard® is a multifunctional [chlorinating] sanitizer that kills bacteria and controls algae, prevents metal staining and corrosion, reduces scale formation and softens water. Its unique additive actually coats metal surfaces, protecting them against corrosion. Additionally, this additive protects pool surfaces from metal stains and acts like a magnet to bind hard water components, making your pool water soft and smooth.

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The SmartGuard® in ALPHA INITIATOR regulates the dissolving rate of ALPHA INITIATOR so you do not have to add them as frequently. Use ALPHA INITIATOR for convenience, protection of your pool and equipment, and better feeling sparkling water.

This sanitizer will last longer compared to chlorine products such as liquid bleach or calcium hypochlorite, as it contains [SUNSHIELD®, which protects chlorine from sunlight, so you use less.] {or} [sunlight protected chlorine.] It's the perfect solution for clear, silky smooth, inviting pool water.

[For best results follow the BioGuard Once-A-Week Three [Part] [Step] System; Weekly Add:

1. ALPHA INITIATOR with SilkGuard® to sanitize your pool.
2. Shock your pool with [a shock product] [BioGuard® Smart Shock] [or] [BioGuard® Easy Shock and Swim] [or] [BioGuard® BurnOut® Extreme] [or] [BioGuard® BurnOut® 35].
3. Prevent algae with BioGuard® Back Up or BioGuard® Algae All 60.]

[The BioGuard® Care System has three important parts that help you maintain crystal blue sparkling water.

- A sanitizer to control bacteria
- A shock to destroy contaminants
- A preventative [algicide][algaecide] to stop algae before it starts

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All parts of the BioGuard Care System are vital to achieve beautiful water.]

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[Alpha Initiator] {or} [This product] should be used as a maintenance sanitizer when using the BioLab UV system].

fungicide, and Rodenticide Act as amended for the pesticide, registered under EPA Reg. No. 5185-40

**DIRECTIONS FOR USE:** It is a violation of Federal Law to use this product in any manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

**INITIAL START-UP.** Consult your BioGuard dealer for initial water balance and start-up procedures. Ensure that pool equipment is operating properly. [Backwash according to manufacturer's directions and clean filter using [Strip Kwik®] [and/or] [Kleen It®] [or] [an appropriate filter cleaner] as necessary.] {or} [Clean or backwash filter following manufacturer's directions.] Add [Stabilizer 100] [stabilizer] to establish a minimum level of 30-40 ppm. [Superchlorinate] {or} [Shock] pool water with [a shock product] [BioGuard® Smart Shock®] [or] [BioGuard® Easy Shock and Swim®] [or] [BioGuard® Burn Out Extreme®] [or] [BioGuard® Burn Out® 35] to obtain a chlorine level of 1-4 ppm. Add initial dosage of [BioGuard® Back-Up®] [or] [BioGuard® Algae All 60®] [algicide][algaecide] per label directions to prevent algae. When using other products as outlined in directions for this product, always follow directions on those products. With the pump operating, add one ALPHA INITIATOR to the pool skimmer basket for each 5,000

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to 7,000 gallons of water or a portion thereof. (\*\*See below) Divide number of sticks evenly for pools with multiple skimmers. Pool circulation must continue for a minimum of 10 - 12 hours to form the protective skin that reduces the erosion of the ALPHA INITIATOR.

**ROUTINE MAINTENANCE:** Test pool water periodically. Maintain pH of 7.2-7.6 and chlorine level of 1.0-4.0 ppm. At least twice a season, have your BioGuard dealer analyze for total water balance.

About once a week, with pump operating, add one ALPHA INITIATOR to the pool skimmer basket for each 5,000 to 7,000 gallons of water. Pool circulation must continue for a minimum of 10 - 12 hours to form the protective skin that reduces the erosion of the ALPHA INITIATOR. Shock pool with [BioGuard® Smart Shock®] [or] [BioGuard® Easy Shock and Swim] [or] [BioGuard® Burn Out Extreme®] [or] [BioGuard® Burn Out® 35] per label directions and add maintenance dosage of [BioGuard® Back-Up] [or] [BioGuard® Algae All 60] [algicide][algaecide] per label directions to prevent algae.

Operate pool recirculation system a minimum of 10 hours per day. Adjusting the hours of pool recirculation or the number of sticks added to the skimmer helps to regulate the sanitizer level.

After four applications, you will experience the full benefits of softened water and equipment protection from SilkGuard®.

\*\*The number of sticks and frequency of addition will vary with the number of swimmers, water temperature, rain showers and pump operating time. You should begin with the one stick per 5,000 gallon rate for heavy bather loads or elevated water temperature.

**Reentry into treated swimming pools is prohibited above levels of 4 ppm chlorine due to risk of body injury.**

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**STORAGE AND DISPOSAL:** Keep this product dry in original tightly closed container when not in use. Store in a cool, dry, well-ventilated area away from heat or open flame. **CONTAINER DISPOSAL:** Non-refillable container. Do not reuse or refill this container. Offer for recycling if available. If recycling is not available, dispose of empty container in trash. Triple rinse container (or equivalent) promptly after emptying.

**PRECAUTIONARY STATEMENTS:**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS: DANGER:** Corrosive. Causes irreversible eye damage and skin burns. May be fatal if swallowed or inhaled. Do not get in eyes, on skin or on clothing. Do not breathe dust or fumes. Irritating to nose and throat. Wear protective eyewear (safety glasses). Wear protective clothing and rubber gloves. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash clothing before reuse.

**PHYSICAL OR CHEMICAL HAZARDS: STRONG OXIDIZING AGENT:** Do not mix with other chemicals. Mix only with water. Never add water to product. Always add product to large quantities of water. Use clean dry utensils. Do not add this product to any dispensing device containing remnants of any other product. Such use may cause a violent reaction leading to fire or explosion. Contamination with moisture, organic matter or other chemicals will start a chemical reaction and generate heat, hazardous gas, possible fire and explosion. In case of contamination or decomposition, do not reseal container. If possible, isolate container in open air or well ventilated area. Flood area with large volumes of water.

**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 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 INHALED:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call 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. [IN CASE OF MEDICAL EMERGENCY, CALL [1-303-623-5716] [1-877-800-5553] [telephone number supplied by supplemental registrant].]**

**Note to Physician:** Probable mucosal damage may contraindicate the use of gastric lavage.

*{Environmental hazards statement for end-use products of less than 5 gallons (liquid) or less than 50 pounds (solid, dry weight).}*

**[ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish and aquatic organisms.]

ACCEPTED  
with COMMENTS  
EPA

APR - 2 2000

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
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*{Environmental hazards statement for end-use products in containers of equal to or greater than 5 gallons (liquid) or equal to or greater than 50 pounds (solid, dry weight).}*

**[ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish and aquatic organisms. 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.]

NOTE: Buyer assumes all responsibility for safety and use not in accordance with directions.

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with COMMENTS  
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Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 5185-400