

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

29 SEP 1993

H.D. Caughman, Ph.D.
Bio-Lab, Inc.
P.O. Box 1489
Decatur, GA 30031

Subject: BioGuard® Smart Sticks™
EPA Registration No. 5185-403
Your Application for Amendments Dated October 27, 1992

Dear Dr. Caughman:

This is in response to your application for minor label revisions, for a change in retail container sizes, and for addition of alternate suppliers.

The amendment referred to above for minor label revisions and a change in retail container sizes, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. A stamped copy of the labeling is enclosed for your records.

1. Expand the first sentence of the Environmental Hazard section of the label to read, "This pesticide is toxic to fish and aquatic organisms."
2. Submit five copies of the finished labeling before the product is released for shipment bearing the amended labeling.

The amendment referred to above for an additional of alternate suppliers, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is not acceptable, for the reasons given below.

1. Your Confidential Statement of Formula (CSF) is not acceptable. One CSF must be submitted listing the two 99%-active sources of supply for the active ingredient, and a second CSF must be submitted listing the other source -- EPA Registration No. 524-107, which is 100%-active.

CONCURRENCES

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2. On your revised Confidential Statement of Formula, increase the amount of each 99%-active source to 1970 lbs. (column 13-a) and 98.5% by weight (column 13-b). For these two source products also decrease the amount of binder to 20 lbs. (column 13-a) and 1% by weight (column 13-b). (In lieu of the revisions in this paragraph, you may submit an application for label amendment and change the label claim to 96.5% for the active ingredient.)

If you have any questions about these comments, you may call Wallace Powell at 703-305-6938.

Sincerely,



Ruth G. Douglas
Product Manager 32
Antimicrobial Program Branch
Registration Division (H-7504C)

Enclosure

BioGuard[®]

SMART STICKS[™]

Swimming Pool Sanitizer

- Lasts up to twice as long
- Gentle on equipment and liners
- Super convenient to use

Contains Smart Guard[™] Chlorine Protector

ACTIVE INGREDIENT:
Trichloro-s-triazinetrione 97.5%
INERT INGREDIENTS* 2.5%
TOTAL INGREDIENTS 100.0%
(Available chlorine 85.03%)

KEEP OUT OF REACH OF CHILDREN
DANGER:

(See back panel for Statement of Practical Treatment and Precautionary Statements.)



MANUFACTURED BY
BIO-LAB, INC., Decatur, Georgia 30031 USA
*Patent Pending

NET WEIGHT: 27.27 kg (60 lbs.)

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BIOGUARD® SMART STICKS™ with SMART GUARD™ are unique and highly effective as a pool water disinfectant. BioGuard Smart Sticks dissolve very slowly, lasting about twice as long as ordinary sticks or large tablets. Smart Sticks are added to the pool less frequently making them more convenient to use.

Smart Guard® regulates the dissolving rate of Smart Sticks extending sanitizing power and swimmer safety.

DIRECTIONS

It is a violation of federal law to use BioGuard Smart Sticks in a manner inconsistent with its labeling.

INITIAL START-UP: Consult your BioGuard dealer for initial water balance and start-up procedures. Ensure that pool equipment is operating properly. Chemically clean filter with BioGuard Strip Kwik® Filter Cleaner/Degreaser as necessary.

- Add BioGuard Stabilizer 100™ to establish a minimum level of 30-40 ppm.
- Superchlorinate pool water with Burn Out® to obtain a chlorine level of at least 1.5-3.0 ppm. Swimmers should not be permitted in the pool after the initial treatment until the chlorine residual is below 3.0 ppm.

- Add initial charge of Back-Up® Algae Inhibitor.™
- Add one Smart Stick to the pool skimmer basket for each 5,000 to 7,000 gallons of water or a portion thereof. (** See below) Divide sticks evenly for pools with multiple skimmers.

If an automatic feeder is used, fill with Smart Sticks and adjust output to maintain 1.5-3.0 ppm chlorine level.

ROUTINE MAINTENANCE: Test pool water periodically. Maintain pH of 7.4-7.6 and chlorine level of 1.5-3.0 ppm. At least twice a season, have your BioGuard dealer analyze for total water balance.

- About once a week (** See below), add one Smart Stick to the pool skimmer basket for each 5,000 to 7,000 gallons of water. If an automatic feeder is used, refill as necessary to keep stick level between half and full.
- Twice monthly, check pool with Burn Out and add maintenance dosage of Back-Up Algae Inhibitor.
- Operate pool recirculation system approxi-

mately 10 hours per day for best results. Adjusting the hours of pool recirculation, the number of sticks added to the skimmer or the valve setting on automatic feeders regulates the sanitizer level.

Never add any other chemicals to skimmers or automatic feeders containing Smart Sticks. Never mix chemicals together.

** 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 gal. rate for heavy bather loads or elevated water temperature.

STORAGE AND DISPOSAL: Keep product dry in a tightly closed container when not in use. Store in a cool, dry, well ventilated area away from heat or open flame. In case of decomposition, isolate container (if possible) and flood area with large amounts of water to dissolve all materials before discarding this container. Do not reuse empty container, but place in trash collection. Do not contaminate food or feed by storage or disposal or cleaning equipment.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes eye and skin damage. Irritating to nose and throat. Harmful or fatal if swallowed. Will burn with the evolution of chlorine and equally toxic gases. Do not get in eyes, on skin or on clothing. Wear goggles or face shield and rubber gloves when handling. Avoid breathing dust or fumes. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.

PHYSICAL AND CHEMICAL HAZARD: Strong oxidizing agent, will burn with the evolution of chlorine and equally toxic gases. Contact with water slowly liberates irritating and hazardous chlorine-containing gases. Mix only with 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 may start a chemical reaction with generation of heat, liberation of hazardous gases and possible generation of fire and explosion. **IN CASE OF FIRE,** if possible isolate container in open air or well ventilated area. Flood with large volume of water. **IN CASE OF CONTAMINATION OR DECOMPOSITION,** do not reseal container. **STATEMENT OF PRACTICAL TREATMENT (FIRST AID):** IF SWALLOWED, drink promptly a large quantity of water. DO NOT induce vomiting, NEVER GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON. Avoid alcohol. Get medical attention. IF IN EYES, flush with plenty of water for 15 minutes. Get medical attention. IF ON SKIN, immediately brush off excess chemical and flush with plenty of soap and water. Remove contaminated clothing. Wash clothing before reuse. Get medical attention if irritation persists. IF INHALED, remove person to fresh air. Get medical attention.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

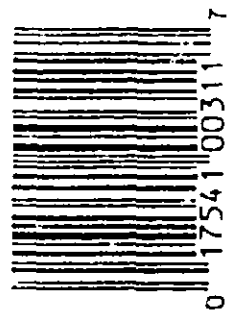
ENVIRONMENTAL HAZARD: This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public water unless this product is specifically identified and addressed in an NPDES Permit. Do not discharge effluent containing this product into sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

EPA Reg. No. 5185-403
EPA Est. No. 5185-GA-2

*Patent Pending

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29 SEP 1995
Under the provisions of the Pesticide Act as amended by the Pesticide Act
Registration No. 5185-403

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