

JUN 29 2000

Mark Jernigan
 Bio-Lab, Inc.
 P.O. Box 1489
 Decatur, GA 30031

Subject: BioGuard Smart Sticks
 EPA Registration No. 5185-403
 Amendment Dated April 17, 2000

Dear Mr. Jernigan:

This amendment was submitted in response to the December 14, 1999 Agency denial letter for the marketing text discussed below.

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, to add the marketing statement will be acceptable provided that you make the labeling changes listed below before you release the product for shipment bearing the amended label.

The word "Enhanced" must be deleted from the marketing text. Enhanced is considered false and misleading because it infers heightened efficacy to the consumer.

The "First Aid Statement" should be updated per the enclosed PR Notice for "First Aid Statement on Pesticide Product Labels" for Toxicity Category I.

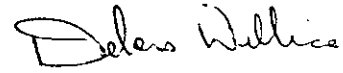
A stamped copy of you labeling is enclosed for your records. Submit one (1) copy of the final printed label prior to release of the product for shipment.

CONCURRENCES

SYMBOL	7510C						
SURNAME	Mitchell						
DATE	6-29-00						

If you have any questions concerning this letter, please contact Wanda Mitchell at (703) 308-6345.

Sincerely,



for Robert S. Brennis
Product Manager 32
Regulatory Management Branch II
Antimicrobials Division (7510C)

Enclosure 4

{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.}

BIOGUARD
SMART STICKS

- [Swimming Pool Sanitizer]
- [Gentle on equipment and liners]
- [Super convenient to use]
- [Contains Smart Guard™ Chlorine Protector.]
- ~~[EPA Reg. # 5185-403, EPA Est. # 5185-GA-1, All other EPA Reg. #s, EPA Est. #s]~~
- [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.}

ACTIVE INGREDIENT:
 Trichloro-s-triazinetrione 96.5%
 OTHER INGREDIENTS: 3.5%
 TOTAL INGREDIENTS: 100.0%
 [(Each stick weighs approximately 1/2 lb.)]

KEEP OUT OF REACH OF CHILDREN
DANGER

FIRST AID: IF IN EYES: Hold eyelids open and flush with a steady gentle stream of water for 15 minutes. Call a physician. IF SWALLOWED: Drink promptly large quantities of water. Avoid alcohol. Do not induce vomiting. Never give anything by mouth to an unconscious person. Call a physician or poison control center immediately. IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention. IF ON SKIN: Wash with plenty of soap and water. Get medical attention. NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. [IN CASE OF MEDICAL EMERGENCY, CALL [1-877-800-5553] [telephone number supplied by supplemental registrant].]

See [back] [side] panel for additional precautionary statements.

MANUFACTURED BY
BIOLAB, INC.
Decatur, Georgia

EPA REG. # 5185-403
EPA EST. # 5185-GA-1

NET WEIGHT:

ACCEPTED
with COMMENTS
in EPA's Federal Register
JUN 29 2000

Under the provisions of the
Federal Insecticide, Fungicide,
and Rodenticide Act,
registered under

5185-403

BIOGUARD® SMART STICKS with SMART GUARD™ are unique and highly effective as a pool water sanitizer. 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 controlling performance during application.

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 filter and use [Strip Kwik®] [an appropriate filter cleaner] as necessary. Add [Stabilizer 100™] [stabilizer] to establish a minimum level of 30-40 ppm. Superchlorinate pool water with Burn Out® WP or Burn Out® 35, for vinyl-liner pools, to obtain a chlorine level of at least 1-3 ppm. Add initial dosage of Back-Up® algaecide. When using other products as outlined in directions for this product, always follow directions on those products. With the pump operating, 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 number of sticks evenly for pools with multiple skimmers. Pool circulation must continue for a minimum of 8 – 12 hours to form the protective skin that reduces the erosion of the Smart Stick.

ROUTINE MAINTENANCE: Test pool water periodically. Maintain pH of 7.2-7.6 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, with pump operating, add one Smart Stick to the pool skimmer basket for each 5,000 to 7,000 gallons of water. Pool circulation must continue for a minimum of 8 – 12 hours to form the protective skin that reduces the erosion of the Smart Stick. Shock pool with Burn Out® WP or Burn Out® 35, for vinyl-liner pools, per label directions and add maintenance dosage of Back-Up algaecide per label directions.

Operate pool recirculation system approximately 10 hours per day for best results. Adjusting the hours of pool recirculation or the number of sticks added to the skimmer helps to regulate the sanitizer level.

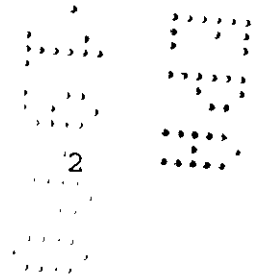
**The number of sticks and frequency of addition will vary with the number of swimmers, water temperature, rain showers and pump operating time. You should begin with the one stick per 5,000 gallon rate for heavy bather loads or elevated water temperature.

Reentry into treated swimming pools is prohibited above levels of 3 ppm chlorine due to risk of body injury.

ACCEPTED
with COMMENTS
in EPA Letter D-1000

JUN 29 2000

Under the Federal Insecticide, Fungicide, and Rodenticide Act
registered under the FIFRA Act
5185-403



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. Moisture may decompose this product and cause a violent reaction leading to fire and explosion. In case of decomposition, isolate container if possible and flood area with large amounts of water to dissolve all material before discarding this container. Do not contaminate food or feed by storage or disposal. **CONTAINER DISPOSAL:** Do not reuse container, but place in trash collection. Rinse thoroughly before discarding in trash.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER: Corrosive. Causes burns. Causes irreversible eye damage. May be fatal if swallowed or inhaled. Do not get in eyes, on skin or on clothing. Wear goggles or 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 contaminated 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.

{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.]

{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.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUN 29 2000

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide
registered under EPA Reg. No. 5185-1103

