

5185-403 02/12/2009 1/7
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460



Office of Pesticide Programs

Mark Jernigan
Federal Registration Manager
Bio-Lab, Inc.
PO Box 300002
Lawrenceville, GA 30049-1002

FEB 12 2009

FILE COPY

Subject: BioGuard Smart Sticks
EPA Registration No. 5185-403
Application Date: December 22, 2008
Receipt Date: December 29, 2008

Dear Mr. Jernigan:

The following amendments, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are acceptable with the condition below:

- Increase the re-entry level to 4ppm chlorine
- Revise Storage and Disposal Statement per PR Notice 2007-4
- Removal of First Aid Statement to Back Panel
- Minor typographical changes and corrections

Condition:

The routes of exposure must be listed in the following order for the First Aid Statement: "IF IN EYES", "IF ON SKIN OR CLOTHING", "IF SWALLOWED", "IF INHALED".

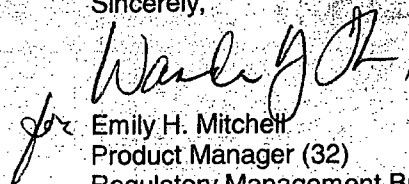
General Comments:

1. 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.

2. A stamped copy of the accepted labeling is enclosed. Submit 1 copy of your final printed label 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 Emily H. Mitchell
Product Manager (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)

{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**

{Master Label}

ACTIVE INGREDIENT:
Trichloro-s-triazinetrione 96.5%
OTHER INGREDIENTS: 3.5%
TOTAL INGREDIENTS: 100.0%
[(Each stick weighs approximately 1/2 lb.)]
(Available Chlorine: 88%)

ACCEPTED
with COMMENTS
EPA Letter Dated:

FEB 12 2009
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended for the pesticide,
registered under EPA Reg. No. 5185-403

**KEEP OUT OF REACH OF CHILDREN
DANGER**

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

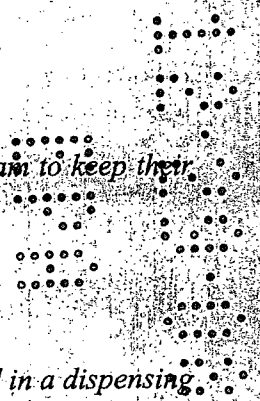
BIO-LAB, INC.
PO Box 300002
Lawrenceville, Georgia 30049

EPA REG. NO. 5185-403
EPA EST. NO. 5185-GA-1

NET WEIGHT: {as indicated on container}

{Optional marketing statements that may be used with sticks}

- [Swimming Pool Sanitizer]
- [Gentle on equipment and liners]
- [Super convenient to use]
- [Contains Smart Guard™ Chlorine Protector.]
- [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]



{Optional marketing statements that may be used with the product when it is placed in a dispensing cartridge for use with the BioGuard [Crystal Blue] [Cyclone] Feeder}

- [Swimming Pool Sanitizer]
- [Gentle on equipment and liners]

[Super convenient to use]

[Contains Smart Guard™ Chlorine Protector.]

[For use with the BioGuard Crystal Blue Program]

[For use with the BioGuard Crystal Blue Feeder]

[Use with as little as 0.5 ppm free chlorine]

[Kills Bacteria]

[When used with Crystal Blue mineral cartridge reduces chlorine usage]

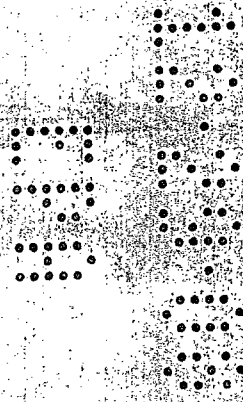
[Use less chlorine when used with Crystal Blue mineral cartridge]

[Kills algae]

[Inhibits algae]

[Maintains Brilliantly Clear Water]

[For use with the BioGuard Cyclone Program]



{Directions to be used for sticks }

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 [a shock product] [BurnOut® Extreme] [or] [BurnOut® 35], for vinyl-liner pools, to obtain a chlorine level of at least 1-4 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 10 – 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 10 – 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 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.

**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.

{Directions to be used with the product when it is placed in a dispensing cartridge for use with the BioGuard Crystal Blue Feeder}

This product, when used as directed, releases the chlorine to sanitize your pool in conjunction with the BioGuard [Crystal Blue] [Cyclone] Mineral Cartridge. This reduces the growth of harmful algae and bacteria in your pool. This cartridge is not a floating device and is only to be used with the BioGuard [Crystal Blue] [Cyclone] Feeder. The BioGuard [Crystal Blue] [Cyclone] Program uses less chlorine and you still keep beautiful sparkling water. When used with the BioGuard [Crystal Blue] [Cyclone] Mineral Cartridge, chlorine levels can be maintained as low as 0.5 ppm.

Directions for Use: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

Product Application:

Turn off circulation. Remove cartridge from this bag then remove tape that covers inlet and outlet openings on top and bottom of cartridge. Discard bag and tape in trash.

Remove lid from BioGuard [Crystal Blue] [Cyclone] Feeder housing. Next, remove the empty [BioGuard Smart Sticks Chlorinating Cartridge] from the BioGuard [Crystal Blue] [Cyclone] Feeder housing (allow any water remaining in empty cartridge to drain back into the housing before disposing of cartridge) and replace with this full cartridge. Replace lid of housing and turn circulation back on. Set chlorine delivery dial at base of the housing to maximum setting. After 24 hours check chlorine residual level with a test kit or test strip. If the residual chlorine is too high, lower the dial setting on the base and retest in 24 hours. In conjunction with the BioGuard [Crystal Blue] [Cyclone] Mineral Cartridge, maintain chlorine residual of 0.5 ppm to 1.5 ppm. The system can only be operated below 1 ppm chlorine residual in conjunction with the BioGuard [Crystal Blue] [Cyclone] Mineral Cartridge.

Test chlorine residual on a regular basis and if below 0.5 ppm chlorine residual, increase dial setting. After 2 - 3 weeks, if chlorine residual is below 0.5 ppm, and if increasing dial setting does not increase chlorine residual, check [Chlorinating Cartridge] [Cyclone Sanitizer Cartridge] and replace if empty.

Special Note: Discard cartridge when empty. Do not attempt to refill this product. Turn cartridge on side and remove closure on bottom of container by pulling tear tab. Place any product residue remaining in cartridge in pool skimmer and rinse thoroughly before discarding in trash.

Reentry into treated swimming pools is prohibited above levels of 4 ppm chlorine due to risk of bodily 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. Do not contaminate food or feed by storage or disposal. **CONTAINER DISPOSAL:** Non-refillable container. Do not reuse or refill this container. Offer for recycling, if available. Triple rinse container (or equivalent) promptly after emptying.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER: Corrosive. Causes skin 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.

{First Aid will be separated by rule lines from adjacent text and be in a different color.}

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.

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. *{The following sentence to be used with the product when it is placed in a dispensing cartridge for use with the BioGuard Crystal Blue Feeder}* [When using automatic feeding devices, always follow manufacturer's directions as to the proper addition of sanitizer product to chlorinators.] 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).}

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[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.

Revision 1208, 4 ppm, PCR

