



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

August 21, 2008

Mark Jernigan  
Federal registrant manager  
**Bio-Lab, Inc.**  
PO Box 300002  
Lawrenceville, GA 30049-1002

Subject: Product name: SpaGuard Accessory Spa Silken  
EPA Reg. Number: 5185-492  
Application Date: 21-Jul-2008  
Receipt Date: 23-Jul-2008

Dear Mr. Jernigan:

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

Proposed amendments:

- Label revisions: Adjusting label rates

Labeling comment(s)

- The word "**WARNING**" is a part of the precautionary statement heading. Therefore, it must be in the size and large bold letters as with the rest of the heading.

General comments:

A stamped copy of the label is enclosed for your record.

Please note that the Agency is moving away from review of paper submitted registration applications to electronic review of applications. Therefore, we need your help to make this an efficient and convenient process for both you and the Antimicrobials Division. Accordingly, we are asking you to submit future labeling amendments for this product via the electronic labeling process. Refer to the following website for guidance on electronic submissions, including label: [http://www.epa.gov/oppfead1/eds/esr\\_guidance.htm#overallsub](http://www.epa.gov/oppfead1/eds/esr_guidance.htm#overallsub). If you have questions concerning electronic labeling, a list of contacts is available at the following site: <http://www.epa.gov/oppfead1/eds/edsgoals.htm#contacts>

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If you have any questions concerning this letter, please contact me by telephone at (703) 308-6422 or by e-mail at [heyward.adam@epamail.epa.gov](mailto:heyward.adam@epamail.epa.gov) during the hours of 8:00 am to 4:00 pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,



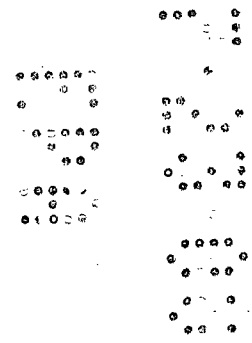
Adam Heyward  
Product Manager 34  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

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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.}

**SPAGUARD ACCESSORY SPA SILKEN**

- [Compatible with spas sanitized with chlorinating or brominating products]
- [Effective with all spa programs]
- [Effective with all spa water treatment programs]
- [Clarifies the water]
- [Helps inhibit algae growth]
- [Patented Technology\*]
- [Inhibits algae growth]
- [Suppresses algae growth]
- [Creates sparkling clear spa water]
- [Softens spa water]
- [Enhances soaker comfort]
- [Provides soft, clear, silky water]
- [For Spas and Hot Tubs]



ACTIVE INGREDIENT:  
Sodium Tetraborate Pentahydrate 100.0%

KEEP OUT OF REACH OF CHILDREN  
**WARNING**

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

**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 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. **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.

**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].]**

BIOLAB, INC.  
PO BOX 300002  
LAWRENCEVILLE, GA 30049

EPA REG. NO. 5185-492  
EPA EST. NO. 5185-GA-1

\*U.S. Patent # 4,594,091

NET WEIGHT \_\_\_\_\_

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

**AUG 21 2008**  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. **5185-492**

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[Spa Silken] [This product] works with [all major] spa water treatment programs to improve the feel and clarity of the water and suppresses algae growth. It enhances soaker comfort by providing soft, clear, silky water. It is especially effective with chlorinated and brominated spas and hot tubs. This product is suitable for [biguanide treated water and] use with mineral treatment systems in spas and hot tubs.

**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.

**Initial Application Use or Re-fill:**

Apply [6 ounces] {or} [3/4 cups] of [Spa Silken] [this product] for each 200 gallons for spa water. The application of Spa Silken will cause the pH of your water to increase. It will be necessary to also apply [SpaGuard] pH Decreaser to properly balance the pH of your spa water as part of the application of Spa Silken. For each [6 ounces] {or} [3/4 cups] of [Spa Silken] [this product], [3 ounces] {or} [6 Tablespoons] of [SpaGuard] pH Decreaser will be needed.

The sequence of the application is: 1/2 of the Spa Silken total dosage, all of the pH Decreaser dosage followed by the remaining 1/2 of the Spa Silken total dosage. All applications should be done with the circulation pump operating. Each product is sprinkled into the area of the water with the most agitation. After each addition of product, be sure any undissolved granules are brushed off spa surfaces. Allow the water to circulate for 15 minutes between each application and for 20 to 30 minutes following the last application. Spa use may resume once this circulation time is finished.

**Maintenance:**

Residential spas should be drained and refilled every 60 to 90 days. Commercial spas should follow local guidelines for refill frequency. Follow refill directions above after addition of refill water. Maintenance applications of [Spa Silken] [this product] may be needed if spa is not refilled frequently. Taking a sample of your spa water to your [SpaGuard [Authorized]] Dealer for testing each month is recommended.

**STORAGE AND DISPOSAL:** Store in original container and place in locked storage area. Do not contaminate water, 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:** **WARNING:** Causes substantial but temporary eye injury. Harmful if swallowed. Do not get in eyes or on clothing. Wear protective eyewear (goggles or safety glasses) when handling this product. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.

**PHYSICAL OR CHEMICAL HAZARDS:** Do not mix with other chemicals. Do not add through skimmer. Do not add to any dispensing device.

*{Environmental hazards statement for end-use products in containers of less than 50 pounds (solid, dry weight).}*

**[ENVIRONMENTAL HAZARDS:** Keep out of lakes, ponds or streams. Do not contaminate water by cleaning of equipment or disposal of wastes.]

*{Environmental hazards statement for end-use products in containers of equal to or greater than 50 pounds (solid, dry weight).}*

**[ENVIRONMENTAL HAZARDS:** Keep out of lakes, ponds or streams. Do not contaminate water by cleaning of equipment or disposal of wastes. 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: 0708 Container Disposal & Directions*