



## OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

December 4, 2023

Ashley Ashe  
Regulatory Affairs Team Leader  
KIK Consumer Products  
1725 North Brown Road  
Lawrenceville, GA 30043  
Electronic Transmittal: Ashley.Ashe@KIKCorp.com

Subject: Label Amendment – Changes Required by the Boric Acid Interim Registration Review Decision  
Product Name: Spaguard Accessory Spa Silken  
EPA Registration Number: 5185-492  
Received Date: 12/3/2018  
Decision Number: 549075

Dear Ashley Ashe:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the Registration Review of the above referenced product in connection with the Boric Acid Amended Interim Registration Review Decision, and has concluded that your submission is acceptable.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. Pursuant to 40 CFR 156.10(a)(6) you must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised

labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. See FIFRA section 2(p)(2). If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process, FIFRA section 12(a)(1)(B). Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Megan Snyderman by phone at 202-566-0639 or via email at [snyderman.megan@epa.gov](mailto:snyderman.megan@epa.gov).

Sincerely,

A handwritten signature in cursive script that reads "Kimberly Wilson".

Kimberly Wilson  
Senior Environmental Protection Specialist  
Reevaluation Branch  
Antimicrobials Division  
Office of Pesticide Programs

Enclosure

*{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

### ACTIVE INGREDIENT:

Sodium Tetraborate Pentahydrate 100.0%

### KEEP OUT OF REACH OF CHILDREN

### WARNING

See [back] [side] panel for First Aid and additional Precautionary Statements. *{If First Aid appears on back or side panel}*

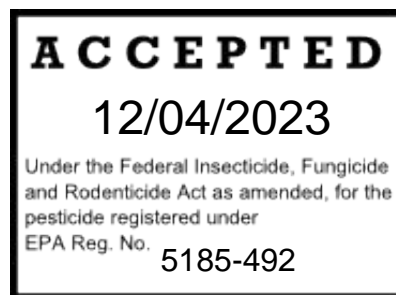
See [back] [side] panel for additional precautionary statements. *{If First Aid appears on front panel}*

**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 [(BL)] {or} [(Z)]  
7616-CA-1 [(C)]



*{If multiple EPA Establishment Numbers appear on the label.}*

[Actual establishment shown in code above or below label printed on [bottle] [container]]

[Letter designation in lot code printed above or below on [bottle] [container] identifies actual establishment.]

NET WEIGHT: *{as indicated on container}*

*{Optional marketing statements}*

[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\*]

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

[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]

[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.

**DISCHARGE DIRECTIONS FOR SPA AND HOT TUB USES** - Before draining a treated spa or hot tub, contact your local sanitary sewer and storm drain authorities and follow their discharge instructions. Do not discharge treated spa or hot tub water to any location that flows to a gutter, storm drain or natural water body unless discharge is allowed by state and local authorities.

**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. Triple rinse container (or equivalent) promptly after emptying. Offer for recycling if available or place in trash.

**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 thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated 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:** Keep out of lakes, ponds or streams. Do not contaminate water by cleaning of equipment or disposal of wastes.

In the Directions for Use section see specific “Discharge Directions for Spa and Hot Tub Uses.”

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

*{Revision: 11/30/18}*