

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SEP 28 2000

Don Girvan
The John Girvan Company
11730 Phillips Highway
Jacksonville, FL 32257

Subject: Proteam Supreme
EPA Registration No. 51708-11
Submission Dated July 7, 2000

Dear Mr. Girvan:

Thank you for responding to the March 20, 2000 Agency initiated letter.

The submission referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide act, as amended, to revise your May 1, 1997 label will be acceptable provided that you make the labeling changes listed below before you release the product for shipment bearing the amended label.

1. Separate the precautionary language from the first aid statements.
 - a. Add the heading Precautionary Statements
 - b. Place Hazards to Humans and Domestic Animals below Precautionary Statement heading.
 - c. The statement directly below Hazards to Humans and Domestic Animals should read:

Danger. Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear protective eye wear (goggles, face shield, or safety glasses). Harmful if swallowed. Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

CONCURRENCES							
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2. Revise the Precautionary Statement under "First Aid" to read:

- 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 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 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.

NOTE TO PHYSICIAN

"Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage."

3. Remove the term sparkling clear water from the front of the label. It infers that this product could be considered as a sanitizer or disinfectant.

4. Remove the marketing statement "Promotes sparkling, clear water" from beneath the Proteam Supreme heading.

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

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

Sincerely,



Robert S. Brennis
Product Manager 32
Regulatory Management Branch II
Antimicrobials Division (7504C)

ProTeam[®]

Enhancer

Supreme

*Promotes sparkling, clear water and
reduces eye and skin irritation.
Controls algae and improves filtration.*

ACTIVE INGREDIENT:	
Sodium Tetraborate Pentahydrate.....	99.5%
INERT INGREDIENT.....	.5%
	100.0%

DANGER

Keep out of reach of children.

Do not mix ProTeam Supreme with any other chemicals. Corrosive, causes irreversible eye damage. Wear protective eye wear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling. Causes skin and breathing irritation. FIRST AID: 1. SKIN CONTACT: Thoroughly wash with soap and water. 2. EYE CONTACT: Flush with large amounts of water while lifting lids, get medical attention. 3. IF SWALLOWED: Induce vomiting, get medical attention. 4. INHALED: Move to fresh air, administer artificial respiration, get medical attention.

Net Wt. 25 Lbs. / 11.31 Kgs.
U.S. Patent Number 4594091

Manufactured by Girvan, Inc. • 205 Commercial Drive • St. Augustine, Florida U.S.A. 32092

ACCEPTED
with COMMENTS
in EPA Letter Dated:

SEP 28 2000

Product Name: ProTeam Supreme
EPA Reg. No.: 4594091
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51708-11

ProTeam SUPREME

ProTeam SUPREME is specially formulated to enhance water quality by improving filtration and controlling algae. Use of this product promotes sparkling, clear water and reduces eye and skin irritation for swimmers. SUPREME provides long-lasting algae suppression, controlling all types of algae found in swimming pools, as well as aiding in the removal of existing algae stains.

DIRECTIONS

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. For initial application, introduce two pounds of ProTeam SUPREME per each one thousand gallons of pool water by broadcasting the material over the surface area of the pool with the pump running. This initial treatment should be added in two doses with one half of the necessary amount being added in each application. For initial pH adjustment use 3/4 pound ProTeam pH Down (Sodium Bisulfate) or 10 ounces of muriatic acid for each pound of ProTeam SUPREME, mixing acid in a bucket of water, then add to pool.
2. The pH of the pool water may rise as a normal reaction to the introduction of ProTeam SUPREME. After a normal turnover of pool water adjust the pH to 7.4 – 7.6 using a reliable acid demand kit. ProTeam SUPREME is compatible with all materials normally used in swimming pool maintenance.
3. Test the pool water a minimum once a week or as normally required by local Health Authority Regulations. Sanitizer levels need to be maintained at levels indicated on the sanitizer label. The ProTeam SUPREME residual should be tested at least once each month and should be maintained at 30 – 50 ppm. Your ProTeam Dealer can provide this test and water analysis.
4. ProTeam SUPREME is lost from water only through filter backwash and splash-out.

WINTERIZATION

A pool that has been treated with ProTeam SUPREME will remain clear and be beautiful throughout the winter months with little or no effort. The pool should be tested to assure that an adequate level of ProTeam SUPREME is present before being shut down. See your ProTeam Dealer for freeze protection information.

STORAGE and DISPOSAL

STORAGE: Store in original container in a locked area inaccessible to children or pets. Storage areas should be cool and dry. Keep container tightly closed.

CONTAINER DISPOSAL: Completely empty container into application equipment, then dispose of empty container in a sanitary landfill or by incineration.

EPA REG. NO. 51708-11 EPA EST. NO. 51708-FL-01

ACCEPTED
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Under the Federal Insecticide
Fungicide and Rodenticide Act as
amended for the pesticide

51708-11