

54614-12

10-14-2003

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

October 14, 2003

Ana Rodriguez-Koster
Lewis & Harrison LLC
122 C Street, NW
Suite 740
Washington, DC 20001

Subject: Beachcomber Hot Tubs Plus, Inc.
Super Algyzine
EPA Registration No. 54614-12
Application Date: July 25, 2003
Receipt Date: July 28, 2003

Dear Ms. Rodriguez-Koster:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the conditions listed below:

- revisions to comply with PR Notice 2001-1
- add/revise marketing language on label

Conditions

1. Revise the Hazards To Humans And Domestic Animals statement to read:
CAUTION: Harmful if swallowed. Avoid breathing vapors. Avoid contact with skin, eyes, or clothing. Wash hands thoroughly with soap after handling.
2. Revise the Environmental Hazards statement to read: "This product is toxic to fish and aquatic organisms." Do not discharge effluent containing this product into lakes, ponds, streams, estuaries, oceans or public 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.
3. It is always possible for you to market a product with a subset of accepted uses. Therefore, the term Alternate Directions must be removed from the headings of the proposed label. The headings should appear as follows:

CONCURRENCES

SYMBOL	7510C						
SURNAME	Mitchell						
DATE	10-14-03						

- A. For Use On Recirculating Water Cooling Towers/Cooling Systems.
- B. For Use On Decorative Fountains That Do Not Contain Fish.
- C. For Use On Swimming Pools, Exterior Spas, Whirlpools, Hot Tubs, Decorative Fountains And Ponds That Do Not Contain Fish

4. Add the following under the heading "For Use On Swimming Pools, Exterior Spas, Whirlpools, Hot Tubs, Decorative Fountains And Ponds That Do Not Contain Fish"

Use of this product does not replace the need for normal disinfectant swimming pool and spa products.

5. The hot tub use site must be removed from the last paragraph under the "For Use On Swimming Pools, Exterior Spas, Whirlpools, Hot Tubs, Decorative Fountains And Ponds That Do Not Contain Fish" The repackaged product makes no such assertions.

6. Correct the two typographical errors:

- A. For Use On Decorative Fountains And Ponds That Do Not Contain Fish to read: "... add initially 1 to 2 **fluid** ounces of this product per 1000 gallons of water."
- B. For Use On Swimming Pools, Exterior Spas, Whirlpools, Hot Tubs, Decorative Fountains And Ponds That Do Not Contain Fish to read: "... containing heavy **growth** of algae must be cleaned prior to using this product."

General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit a copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

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

Sincerely,



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

SUPER ALGYZINE

[Beachcomber Hot Tubs Logo][Purity Pool Products Logo]
[[Pool][Spa][Hot Tub] [Treatment]
[A signature line of products]
[Judy Scott, founder]
[[For use in][Pools][Spas][Hot Tubs]]

ACCEPTED
with COMMENTS
EPA Letter Dated:

OCT 14 2003

ACTIVE INGREDIENT:

Poly(oxyethylene(dimethyliminio)ethylene..... 30.0%
(dimethyliminio)ethylene dichloride) Under the Federal Insecticide,
Fungicide, and Rodenticide Act as

INERT INGREDIENT:

amended for this pesticide, 70.0%
registered under EPA Reg. No. 54614/12 100.0%

TOTAL:

KEEP OUT OF REACH OF CHILDREN

CAUTION

(Note to reviewer: Boxed format or bullets may be used in First Aid section if label space permits)

FIRST AID:

IF SWALLOWED: Call a 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 a poison control center or doctor. Do not give anything by mouth to an unconscious person.

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 a poison control center or doctor for further 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

[See [side][back][left][right] Panel for Additional Precautionary Statements]

Net Contents: _ _

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Avoid breathing vapors. Avoid contact with skin, eyes, or clothing.

(Note to reviewer: If container size is 5 gallons or larger, the following Environmental Hazards statements will be used:)

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish. Keep out of lakes, streams, or ponds. Permits may be required for discharges containing this pesticide into lakes, streams, ponds, or public waters. For guidance, contact the regional office of the Environmental Protection Agency.

DIRECTIONS FOR USE

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

<ALTERNATE DIRECTIONS FOR USE ON RECIRCULATING WATER COOLING TOWERS AND/OR COOLING SYSTEMS:>

[This product is used to control algae, bacteria, and fungi in recirculating commercial and industrial water cooling towers and cooling systems. Prior to its use, systems must be cleaned to remove algae growth, microbiological slime, and other deposits. An initial slug addition of 1.90 to 4.75 fluid ounces of this product per 1000 gallons of water to provide a concentration of 16 to 40 parts per million of this product based on the total weight of water in the system, is recommended. Repeat initial dosage until control is evident.

Subsequent slug additions of 0.47 to 4.75 fluid ounces of this product per 1000 gallons of water (4 to 40 parts per million of this product) must be employed every 2 to 5 days, or as needed. The frequency of addition depends upon the relative amount of bleedoff and the severity of the microbiological problem. Slug additions must be made in the sump of water cooling towers. This product is used to control bacteria in industrial air-washing systems that maintain effective mist eliminating components. Prior to its use, systems must be cleaned to remove bacterial slime and other deposits. An initial slug dose of 7.1 to 11.9 fluid ounces of this product per 1000 gallons of water is recommended. Repeat initial dosage until control is evident. Subsequent slug additions of 4.8 to 11.9 fluid ounces of this product per 1000 gallons of water must be employed each 1 to 5 days, or as needed. The frequency of addition depends upon the relative amount of bleedoff and severity of the bacterial problem. Slug addition may be made to the slump or to the water collection trays of the airwash system.]

<ALTERNATE DIRECTIONS FOR USE ON DECORATIVE FOUNTAINS THAT DO NOT CONTAIN FISH:>

[This product is used to control the growth of algae in decorative fountains, which do not contain fish. For maximum effectiveness, decorative fountain must be cleaned prior to using this product. Decorative fountains having just visible algae growth requires an initial dose of 2 to 4 fluid ounces of this product per 1000 gallons of water. For treatment of a freshly cleaned decorative fountain, add initially 1 to 2 ounces of this product per 1000 gallons of water. Subsequent additions of 0.5 to 0.8 fluid ounces of this product must be made every 5 to 7 days after initial treatment for maintenance.]

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<ALTERNATE DIRECTIONS FOR USE ON SWIMMING POOLS, SPAS, WHIRLPOOLS,
HOT TUBS, DECORATIVE FOUNTAINS AND PONDS THAT DO NOT CONTAIN FISH:>

[This product is used to control the growth of algae in [swimming pools], [exterior spas], [whirlpools], [hot tubs], [decorative fountains] [and][or] ponds that do not contain fish. For maximum effectiveness [pools], [spas], [whirlpools], [hot tubs], [decorative fountains], [and] [or] [ponds] containing heavy grow of algae must be cleaned prior to using this product. For pools having just visible algae growth add an initial dose of 24 to 36 fluid ounces of this product per 10,000 gallons of water and remove settled algae debris by cleaning. For treatment of a freshly cleaned and filled pool, add initially 13 to 24 fluid ounces of this product per 10,000 gallons of water. Subsequent additions of 4 to 9 fluid ounces of this product must be made every 5 to 7 days after initial treatment for maintenance.

[Spa], [whirlpools], [hot tubs], [decorative fountains], [and] [or] [ponds] having just visible algae growth require an initial dose of 2 to 4 ounces of this product per 1000 gallons of water. Subsequent additions of 0.5 to 0.8 fluid ounces of this product must be made every 5 to 7 days after initial treatment for maintenance.

[This product will prevent growth of most algae during the off-season winter months when pools are not in use. For pools which have been properly treated during the swimming season and are free of visible algae, add 13 to 21 fluid ounces of algaecide per 10,000 gallons of water. If at the end of the swimming season pools have some visible algae growth, add 25 to 37 fluid ounces per 10,000 gallons. It is necessary that a uniform distribution of algaecide, throughout the water and the pool be made for maximum effectiveness. If pool is not covered, it may be necessary to repeat the treatment one or more times during the season.]

This product is compatible with those chemicals normally used to treat [pools], [spas] [and] [hot tubs] and is effective at both acid and alkaline pH. This product can be used in [pools], [spas] [and] [hot tubs] treated with chlorine chemicals and may reduce the amount of those chemicals normally required. However, do not mix this product with concentrated dry or liquid chlorine products.]

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Do not stack more than four drums high. Leaking or damaged drums should be placed in overpack drums for disposal. Spills should be absorbed in sawdust or sand and disposed of in a sanitary landfill. Keep container closed when not in use.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: PLASTIC: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, by incineration, or, if allowed by state and local authority, by burning. If burned, stay out of smoke. METAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

HMIS/NPCA RATING

Health 1 Flammability 1 Reactivity 1

[MANUFACTURED FOR:][MANUFACTURE BY:][SOLD BY:]
Beachcomber Hot Tubs Plus, Inc.
13245 Comber Way, Surrey, BC, CANADA V3W 5V8

EPA Reg. No. 54614-12
EPA Est. No. *(insert EPA Est. No. here)*

[Made in Canada]

[For proper care and maintenance of your [pool][spa][hot tub] ask for Beachcomber's Guide to [Clean and Simple] [Pool][Spa][Hot Tub] Water]
[For more detained instructions, ask for Purity's Guide to Pool Water Care]

ACCEPTED
with COMMENTS
EPA Letter Dated:

OCT 14 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 54614-12

b/h