



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460**

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

April 28, 2008

Michael Harvey, President
Enviro Tech Chemical Services, Inc.
500 Winmoore Way
Modesto, CA 95358

Subject: **Clearaid SCP**
EPA Registration No. 63838-8
Application Date: April 13, 2008
Receipt Date: April 21, 2008

Dear Mr. Harvey:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the following comment(s).

Proposed Amendment:

- Revised Labeling

Labeling Comments:

1. For paper manufacture, add the following statement prior to the instructions in the paper manufacture paragraph:

PULP, PAPER, AND PAPERBOARD MILLS:

THIS PRODUCT IS ONLY FOR USE IN NON-FOOD APPLICATION, such as Brown Paper mills, Sheet for Corrugated Board, Kraft Paper, Newsprint and similar paper/ paperboard not intended for food contact uses.

2. The word "CAUTION" must be the same size as the precautionary statement heading. The precautionary statement heading must be displayed as follows:

**"PRECAUTIONARY STATEMENT
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION"**

A stamped copy of the label is enclosed.

General Comments:

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. 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>.

If you have further questions concerning this letter, please contact me by telephone at (703) 308-6422 or by e-mail at heyward.adam@epa.gov or Killian Swift by telephone at (703) 308-6346 email address at: swift.killian@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)

Enclosure: Stamped Label

CLEARAID SCP

DIRECTIONS FOR USE

ACTIVE INGREDIENT:

Poly [oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene dichloride]..... 60.0%

INERT INGREDIENTS..... 40.0%

TOTAL..... 100.0%

KEEP OUT OF REACH OF CHILDREN CAUTION

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 further treatment advice.
If on Skin	-Take off contaminated clothing. -Rinse skin immediately with plenty of water for 15-20 minutes. -Call a poison control center or doctor for further 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 by mouth-to-mouth if possible. -Call a poison control center or doctor for further treatment advice.
HOTLINE NUMBER	
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment.	

IN CASE OF EMERGENCY ENDANGERING LIFE OR PROPERTY, CALL: 800-424-9300

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Avoid contact with eyes, skin or clothing. Harmful if swallowed. Avoid breathing vapors. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds or 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 discharging. 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.

Manufactured by:

ENVIRO TECH CHEMICAL SERVICES, INC.
500 Winmoore Way
Modesto, CA 95358 USA
209-581-9576

EPA Est. No. 63838-CA-01
EPA Reg. No. 63838-8

Item 041x- V2

ACCEPTED
with COMMENTS
EPA Letter Dated:
APR 28 2008
Under the Federal Insecticide,
Fungicide and Rodenticide Act as
amended under EPA Reg. No. 63838-8
Net Contents: _____ lbs/kgs

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Clearaid SCP is used to control the growth of algae in swimming pools, heated swimming pools, exterior whirlpools, hot baths, and decorative fountains and ponds. It is used to control algae, bacteria, and fungi in recirculating commercial and industrial cooling water towers.

COOLING WATER TOWERS

Prior to using Clearaid SCP in cooling water towers, systems should be cleaned to remove algal growth, microbiological slime, and other deposits. Then make an initial slug addition of 0.5-2.2 fluid ounces of Clearaid SCP per 1000 gallons of water to provide 8-20 ppm Clearaid SCP, based on the total weight of water in the system. Repeat initial dosage until control is evident. Make subsequent slug additions of 0.2-2.2 fluid ounces of Clearaid SCP per 1000 gallons of water (2-20 ppm) every 2-5 days or as needed. The frequency of addition depends upon the relative amount of bleed-off and the severity of the microbiological problem. Slug additions should be made in the cooling water tower sump.

INDUSTRIAL AIR WASHING SYSTEMS

Clearaid SCP is used to control bacteria in industrial air washing systems that maintain effective mist eliminating components. Prior to its use, systems should be cleaned to remove bacterial slime and other deposits. An initial slug dose of 3.33-5.55 fluid ounces of Clearaid SCP per 1000 gallons of water is recommended. Repeat initial dosage until control is evident. Subsequent slug additions of 2.25-5.55 fluid ounces of Clearaid SCP per 1000 gallons of water should be employed every 1-5 days, or as needed. The frequency of addition depends upon the relative amount of bleed-off and severity of the bacterial problem. Slug additions may be made to the sump or to water collection trays of the air wash system.

SWIMMING POOLS, HEATED SWIMMING POOLS, EXTERIOR WHIRLPOOLS, AND HOT BATHS

For maximum effectiveness of Clearaid SCP in swimming pools, heated swimming pools, exterior whirlpools, and hot baths, those with heavy growths of algae should be cleaned prior to using Clearaid SCP. For pools having just visible algae growth, add an initial dose of 11-17 fluid ounces of Clearaid SCP per 10,000 gallons of water and remove settled algae debris by cleaning. For treatment of a freshly cleaned and filled pool, add initially 6-11 fluid ounces of Clearaid SCP per 10,000 gallons of water. To maintain pools free of visible algae growth, subsequent additions of 2-4 fluid ounces of Clearaid SCP per 10,000 gallons of water should be made every 5-7 days after the initial treatment. Uniform distribution of Clearaid SCP throughout the water in the pool is necessary for maximum effectiveness. Clearaid SCP is compatible with those chemicals normally used to treat pools and is effective at both acid and alkaline pH. Clearaid SCP can be used in pools treated with chlorine chemicals and may reduce the amount of those chemicals normally required. However, do not mix Clearaid SCP with concentrated dry or liquid chlorine products.

DECORATIVE/ORNAMENTAL WATER SYSTEMS

Clearaid SCP is used to control the growth of algae in fresh or recycled water features, ponds and lined reservoirs for non-potable uses. Systems containing heavy growths of algae should be manually cleaned prior to treatment. Systems with just-visible algae growth require an initial dose of 1.0-2.0 fluid ounces of Clearaid SCP per 1000 gallons of water in the system. To treat a freshly cleaned and filled system, add 0.5-1.5 fluid ounces of Clearaid SCP per 1000 gallons of water. Maintenance dosages of 0.2-0.5 fluid ounces of Clearaid SCP per 1000 gallons of water should be added as needed every 5-7 days, or on a continuous basis for larger systems. Additions of Clearaid SCP should be made at a point to ensure uniform distribution throughout the system. Clearaid SCP may be used in systems treated with chlorine chemicals and may reduce the amount of those chemicals normally required, but do not mix Clearaid SCP with concentrated dry or liquid chlorine products.

PAPER MANUFACTURE

Clearaid SCP will retard microbial growth that causes degradation of cooked starch used in paper manufacture. Clearaid SCP is added at a rate of 25-250 ppm based on the total weight of the starch and water. The treatment rate necessary to retard spoilage of the starch will vary with the extent of contamination of the make-up water and the length of storage.

NOTE: Do not use in paper and paperboard that will contact food.

STORAGE AND DISPOSAL

DO NOT CONTAMINATE WATER, FOOD, OR FEED BY STORAGE OR DISPOSAL.

PESTICIDE STORAGE: Do not stack more than four (4) drums high. Leaking or damaged drums should be placed in over-pack 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: Nonrefillable container. Do not use this container to hold materials other than pesticides or dilute pesticides (rinsate). After emptying and cleaning, it may be allowable to temporarily hold rinsate or other pesticide-related materials in the container. Contact your state regulatory agency to determine allowable practices in your state. Clean container promptly after emptying. Offer for recycling if available. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

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