

JUNE 9, 2000

Ms. Ana Rodriguez-Koster,  
Lewis & Harrison, LLC, Agent for  
**MAREVA, INC. Z.A.C. de Saint Esteve**  
122 C Street, N.W., Suite 740  
Washington, D.C. 20001

Dear Ms. Rodrigue-Koster:

Subject: Label Amendment-Add Spa Use  
REVACIL  
EPA Registration Number 69461-1  
Amended Application Dated December 13, 1999

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, section 3(c)(7)(A), as amended, is acceptable provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.
2. Make the labeling changes listed below before you release the product for shipments bearing the amended labeling:
  - a). Revise the "First Aid Statements" in accordance with PR Notice 2000.03.
  - b). The word "WARNING" in the precautionary section must be grouped together with the precautionary heading and displayed as follows:

**"PRECAUTIONARY STATEMENTS"**  
**HAZARD TO HUMANS & DOMESTIC ANIMALS**  
**WARNING"**

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

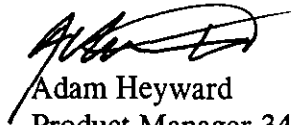
- c). The statement "Causes substantial but temporary eye injury. Harmful if swallowed" is a part of the precautionary statements and therefore must be grouped together with the rest of the precautionary statements.

3. Submit five (5) copies of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records.

Sincerely,



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

Enclosure

# REVACIL

SWIMMING POOL, SPA AND HOT TUB SANITIZER AND ALGISTAT

**CHLORINE-FREE**

Active ingredient: Poly  
(iminoimidocarbonyliminoimi  
do-  
carbonyliminohexamethylene  
hydrochloride) .....20%  
Inert ingredients .....80%

EPA Reg. No. 69461-1

EPA Est. No. 69461-FRA-001

## WARNING

KEEP OUT  
OF REACH OF  
CHILDREN

See side panel for  
additional  
precautions and  
First Aid treatment.

Do not use in freestanding spas/hot tubs.  
Do not use in unpainted plaster pools  
previously exposed to metals which may cause  
staining. (See current "pool care guide") for  
specific information.

Net Contents :

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
JUN - 9 2000

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 69461-1

PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING CAUSES SUBSTANTIAL BUT TEMPORARY EYE INJURY.  
HARMFUL IF SWALLOWED.

Do not get concentrate in eyes or on clothing. Avoid contact with skin. Avoid breathing vapor or mist. Wash thoroughly with soap and water handling. Wear goggles or shield when handling concentrate. Keep container closed.

FIRST AID

FOR EMERGENCY INFORMATION, CALL THE POISON CONTROL CENTER NEAREST YOU OR 1-800 FAST-MED

IF IN EYES : Immediately flush with plenty of water for at least 15 minutes and get medical attention.  
IF ON SKIN : Wash with plenty of soap and water. Get medical attention if irritation persists.  
IF SWALLOWED : Drink a large quantity of water. Do not induce vomiting. Avoid alcohol. Call a physician. Wash clothing and decontaminate footwear before reuse.

Environmental Hazards

This products is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other water 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 notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of EPA.

NOTICE TO BUYER AND USER

No warranty or warranties, whether expressed or implied are given with respect to this product. All liability with respect to the purchase and use of this product is assumed by the buyer or user or any other party and all liability arising from this product to any person or entity is disclaimed.

For warranty assistance, write General Manager, Mareva Inc., 604-A Greentree Road; Chesapeake, VA 23320; or contact your REVACIL Authorized Dealer. This warranty gives you specific legal rights, and you may have other rights that vary from state to state.

YOUR REVACIL AUTHORIZED DEALER GIVES NO WARRANTY IN ADDITION TO MAREVA INC's WARRANTY AND DISCLAIMS ALL OTHER WARRANTIES INCLUDING THOSE OF FITNESS OR MERCHANTABILITY.

5 9 6  
**This Product is registered as a swimming pool, spa and hot tub sanitizer, not as a disinfectant.**

#### **DIRECTIONS FOR USE**

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

#### **Treating the pool**

##### **Pools Previously Treated with Chlorinating Chemicals**

Important - REVACIL is incompatible with chlorinating chemical products. Consult your authorized Dealer of REVACIL for information on balancing your pool water.

Check with chlorine test kit for free and combined chlorine prior to the beginning of neutralization. To destroy chlorine, add STOP CHLORE chlorine neutralizer per label directions. Filter overnight.

Check with chlorine test kit. If free chlorine is detected, repeat neutralizer treatment.

##### **Freshly Filled and Dechlorinated Pools**

##### **Start up with REVACIL**

Note : If the pool water contains algae or is hazy, consult the problem-solving section of the "Pool Care Guide," available from your authorized Dealer of REVACIL.

- \* Backwash or clean pool filter. Check pool pH; adjust to 7.0 - 7.8 if necessary.

- \* Add REVACIL to give a content of 50 ppm (1/2 gallon product/10,000 gallons of pool water).

- \* After 24 hours, check pH and REVACIL concentration with the test kit for REVACIL and adjust if necessary

##### **Normal Pool Routine**

- \* Every week, check REVACIL concentration and pH.

- \* Maintain REVACIL concentration at about 50 ppm. If concentration falls 10 ppm or more, add a top-up dose. The level should not be allowed to drop below 30 ppm. For example, to raise the REVACIL level 10ppm, add 1 pint per 10,000 gallons of water. Consult the booklet, "The Pool Care Guide for REVACIL," for calculation instructions.

NOTE : REVACIL AND CHLORINE ARE INCOMPATIBLE.

Refer to the Pool Owner's Guide for REVACIL for information on how to deal with accidental chlorination.

REVACIL®, REVATOP®, STOP CHLORE®, and STOP METAL® are trademarks of Mareva

#### **Problem-Solving and Supplemental Pool Information.**

Do not use in freestanding spas/hot tubs. Do not use in unpainted plaster pools previously exposed to metals which may cause staining.

REVACIL is not compatible with many detergents and some supplemental algacides (such as those based on copper).

If algae development, cloudiness, or pool problems occur or additional information on water quality is desired, consult "The Pool Care Guide for REVACIL," available from your Authorized Dealer of REVACIL.

#### **Treating the spa or hot tub**

Important - REVACIL is incompatible with chlorinating or brominating chemical products.

##### **Start up with REVACIL**

- \* Remove chlorine or bromine source and disconnect feeder. Discontinue use of ionizers and electrochlorinators if present.

- \* Drain existing water in spa.

- \* Clean spa/hot tub with water.

- \* Fill spa/hot tub surface with water.

- \* Bring a sample of water to your REVACIL Authorized dealer to check it for proper water balance.

- \* After your water has been balanced, add REVACIL sanitizer to give a concentration of 50 ppm. (1 oz. of product for 150 gallon of water)

- \* Circulate for 30 minutes then check the REVACIL sanitizer level. Adjust if necessary.

##### **Spa/Hot Tub Maintenance**

- \* Every week, check REVACIL concentration and pH. Adjust if necessary.

- \* The REVACIL level should be maintained between 30 and 50 ppm.

- \* The REVACIL level should never drop below 30 ppm.

- \* To raise the sanitizer level to 10 ppm, add 0.2 oz. per 150 gal. of water.

#### **STORAGE AND DISPOSAL.**

##### **[Bulk/Non-Residential Label]**

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

##### **Pesticide storage.**

Keep container closed when not in use. Store in original container in an area inaccessible to children. Protect from freezing. In case of a leak or spill, soak up with absorbent, such as sand earth, or sawdust, and shovel into waste container. Remove waste to chemical waste area, and dispose of in accordance with pesticide disposal instructions.

6 7 6

### **Pesticide disposal**

Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instruction, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA regional Office for guidance.

### **Container Disposal**

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

### **[Residential/Small Container Label]**

#### **Storage**

Keep container closed when not in use. Store in original container in an area inaccessible to children. Protect from freezing. In case of a leak or spill, soak up with absorbent, such as sand earth, or sawdust, and shovel into waste container. Remove waste to chemical waste area, and dispose of in accordance with pesticide disposal instructions.

#### **Disposal**

Securely wrap original container in several layers of newspaper and discard in trash.  
Manufactured by 1998, Mareva inc. Made in France  
Z.A.C St Esteve, 06640 Saint jeannet - Nice - FRANCE