

69461-1

05/19/2010

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

MAY 19 2010

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Cortney Killion
Mareva, Inc.
594 N. Ferdon Blvd.
Crestview, FL 32536

Subject: Revacil
EPA Registration Number: 69461-1
Application Date: January 15, 2010
Receipt Date: February 18, 2010

Dear Ms. Killion:

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

Proposed Amendment:

Label amendment.

Conditions

Revise the label as follows:

- 1.) Revise the "Precautionary Statements" on page 1 to read as follows: "Causes substantial but temporary eye injury. Harmful swallowed *or absorbed through the skin*. Do not get in eyes or on clothing. Avoid contact with skin. Avoid breathing vapor or mist. Wear goggles or face shield. Wash thoroughly with soap and water after handling *and before eating, drinking, and chewing gum, using tobacco or using the toilet*. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals."
- 2.) Revise the "Pesticide Disposal" section on page 4 to be in agreement with PR Notice 83-3, Storage and Disposal Statements by deleting the current language and replacing it with the statement, "*Wastes resulting from the use of this product must disposed of on site or at an approved waste disposal facility.*"
- 3.) The "Container Disposal" section on page 4 for "non residential labels" must be revised to be in compliance with the Container Rule by changing the subheading, Container Disposal, to read "Container Handling." Also, the first two statements in this section must state "*Nonrefillable container. Do not reuse or refill.*"

CONCURRENCES

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4.) Revise the Residential Storage and Disposal statements on page 4 to read:

(Residential Products)

Storage and Disposal

Store in original container and in an area inaccessible to children. Keep container closed when not in use. 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 in accordance with pesticide disposal instructions. Nonrefillable container. Do not reuse or refill. Securely wrap original container in several layers of newspaper and discard in trash.

Please Note: The Container Rule no longer separates Storage and Disposal language by container size. It is not separated by use pattern (i.e. commercial/industrial/institutional vs. residential). The bulk container Storage and Disposal Statements are for the Commercial/Industrial Use patterns.

General Comments:

A stamped label with conditions is enclosed for your records. Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

If you have further questions concerning this letter, please contact me by telephone at (703) 308-6416 or by e-mail at campbell-mcfarlane.jacqueline@epa.gov, or Killian Swift by telephone at (703) 308-6346 or by email at swift.killian@epa.gov. When you are submitting information or data in response to this letter, send a copy of this letter to accompany the submission in order to facilitate processing.

Sincerely,

Jacqueline Campbell-McFarlane
(Acting) Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510P)

Enclosure: Stamped accepted label with conditions

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ACCEPTED
with COMMENTS
in EPA Letter Dated:

MAY 19 2010

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

REVACIL

[P20 D Grade]

[SWIMMING POOL] [SPA] [AND] [HOT TUB] [SANITIZER] [AND] [ALGISTAT]

[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] [owner's] guide" for specific information)]

[Chlorine Free]

[1-877-REVACIL]

[Swimming pool sanitizer and algistat - Not a disinfectant]

[Microbiocide]

[Revacil is a high activity microbiocide and in-can preservative for use in applications such as oil-
in-water and water-in-oil emulsions, industrial reagents, silicone systems and cellulose solutions.
Revacil can also be used for the preservation of animal hides and skins.]

Active Ingredient:

Poly (iminoimidocarbonyliminoimido-
carbonyliminohexamethylene hydrochloride) 20.0%

Other Ingredients:..... 80.0%

TOTAL.....100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

See [Side] [Back] Panel for [Additional] [Precautions] [Precautionary Statements]

and First Aid [Treatment]

Net Contents:

Made in France for Mareva Inc. :
594 N. Ferdon Blvd.
Crestview, FL 32536 - USA
www.revacil.us

EPA Reg. No. 69461-1
EPA Est. No. 69461-FRA-1

[Product of France] [Made in France]

[Member of National Spa & Pool Institute logo]

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

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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 after handling. Wear goggles or shield when handling concentrate.

(Note to Reviewer: Boxed format or bullets may be used in First Aid Section if label space
permits:

FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none"> • 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:	<ul style="list-style-type: none"> • 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 IN EYES:	<ul style="list-style-type: none"> • 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 INHALED:	<ul style="list-style-type: none"> • 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.

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

(If container size is 5 gallons or greater, use the following statement:)

ENVIRONMENTAL HAZARDS

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This product 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.

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(If container size is less than 5 gallons, use the following statement:)

ENVIRONMENTAL HAZARDS

This product is toxic to fish.

*Bracketed text denotes alternate marketing language and use directions.

REVACIL \ 5-05-2010 \ Page 1 of 4

[[This product]REVACIL] [sanitizer] 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 labelling. Important - REVACIL [sanitizer] is incompatible with chlorinating chemical products. Consult your authorized [Dealer of REVACIL] [REVACIL Dealer] for information on balancing your pool water.

[Start up] [Treating the pool]

[Pools Previously Treated with Chlorinating Chemicals]

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

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

(Note to reviewer: Directions may be lettered or numbered on final printed labelling.)

Freshly Filled and Dechlorinated Pools

Start up with REVACIL [sanitizer]

Note: If the pool water contains algae or is hazy, consult the problem-solving section of the "Pool [Owner's] [Care] Guide," available from your authorized [Dealer of REVACIL] [REVACIL Dealer] [(See REVABLU section)].

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

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

* After 24 hours, check pH and REVACIL [sanitizer] concentration with the test kit for REVACIL [SANITIZER] AND adjust if necessary.

[Maintenance] Normal Pool Routine

* Every week, check REVACIL [sanitizer] concentration and pH.

* Maintain REVACIL [sanitizer] 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 [sanitizer] level 10ppm, add [16 oz.] [1 pint] per 10,000 gallons of [pool] water. Consult the booklet, "The Pool [Owner's] [Care] Guide for REVACIL [sanitizer]," for calculation instructions.

NOTE: REVACIL [sanitizer] AND CHLORINE ARE INCOMPATIBLE.

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

REVACIL®, REVATOP®, STOP CHLORE®, REVASTOPCHLORINE®, AND STOP METAL® are trademarks of Mareva, Inc.

* Bracketed text denotes alternate marketing language and use directions.

Problem-Solving and Supplemental Pool Information.

Do not use in unpainted plaster pools previously exposed to metals which may cause staining.

REVACIL [sanitizer] is not compatible with many detergents and some supplemental algaecides (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 [Owner's] [Care] Guide for REVACIL" available from your [Authorized Dealer of REVACIL [sanitizer]] [REVACIL [sanitizer] Authorized Dealer].

[Treating the spa or hot tub]

Important - REVACIL [sanitizer] is incompatible with chlorinating [and] [or] brominating chemical products.

(Note to reviewer: Directions may be lettered or numbered on final printed labelling.)

Start up with REVACIL [sanitizer]

* 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] [surface] [with water] [and filter].

* Fill [spa] [hot tub] [surface] with water.

* {Bring a sample of [spa] [hot tub] water to your [REVACIL [sanitizer]

Authorized-dealer] [Authorized Dealer of Revacil [sanitizer]]-to-check-it-for proper water balance.} [Have your authorized dealer of REVACIL [sanitizer] check your water for proper water balance.]

* After [your] [spa] [hot tub] water has been balanced, add REVACIL [sanitizer] to give a concentration of 50 ppm. (1 (fl.) oz. of product [for] [per] 150 gallon of [spa] [hot tub] water).

* Circulate [water] [for] 30 minutes then check the REVACIL [sanitizer] [level] [concentration] [with REVACIL TEST STRIPS] [and]. Adjust if necessary.

[Normal] Spa/Hot Tub Maintenance

* Every week, check REVACIL [sanitizer] concentration and pH. Adjust if necessary.

* The [level of] REVACIL [sanitizer] [level] should be maintained between 30 and 50 ppm. [When the level of REVACIL is 30 ppm or less, add enough REVACIL to bring the level up to 50 ppm.]

* The [REVACIL level] [spa's level of REVACIL] should never [be allowed to] drop below 30 ppm.

* To raise the [REVACIL] sanitizer level 10 ppm, add 0.2 oz. per 150 gal. of [spa] water.]

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[[This product] [Revacil] is compatible with other [pool] [spa] maintenance products such as [REVATOP][REVABLU][REVAOUT][REVAKLAR][REVApH-UP][REVApH-DOWN][REVALKALINITY] [REVACALCIUM-UP] [REVAFLCCK] [REVAKLAR] [REVAPURE] [REVAFILTER] [REVANET] [REVAPIPE] [REVASTOP- FOAM] [REVASTOP-CHLORINE] [REVASTOP MUSTARD ALGAE] [REVA-SPA Shock] [REVA-SPA Stain and Scale Control] [REVA-SPA Water Line Control] [REVA-SPA Foam Dispenser] [REVA-SPA Water Clarifier] [REVA-SPA Test Strips.]]

(Note to Reviewer: The following use directions will appear on product labels sold for industrial uses:)
[Typical applications and suggested dosages include:]

Product:	Dosage:
Silicones such as silicone emulsions and silicone dispersions	1 lb. to 50 lb. Revacil per 10,000 lb. product.
Tunnel Pasteurization Waters	13 fl. oz. to 1 gal. of Revacil per 1,000 gal. tunnel pasteurization water.
Aqueous Industrial Chemicals such as reagents, oil-in-water emulsions, water-in-oil emulsions, textile spin finish lubricants, wash water and cellulose solutions.	1 lb. to 50 lb. of Revacil per 10,000 lb. of product.
Leather Processing	1b. to 30 lb. per 10,000 product
Aqueous Based Polymer Latices such as polyvinyl acetate and polyvinyl alcohol. Do not use to preserve latices used for paper coating compositions that may contact food.	5 lb. to 50 lb. Revacil per 10,000 lb. product
Aqueous Mineral Slurries such as calcium carbonate, titanium dioxide. Do not use to preserve slurries used for paper coating compositions that may contact food.	5 lb. to 50 lb. Revacil per 10,000 lb. of product
Aqueous Based Adhesives such as animal glues, latex adhesives based on polyvinyl acetate, PYA, etc., starch, synthetic, dextrin, casein and other glues.	5 lb. to 50 lb. Revacil per 10,000 product
Industrial Electrocoats such as electrocoat resins and depositions systems.	10 lb. to 50 lb. Revacil per 10,000 product
Household Consumer Products such as surface cleaners, floor cleaners, fabric stain removers, fabric softeners, fabric conditioners, laundry detergents, laundry additives, automotive care silicone emulsions, and automotive cleaning products.	2.5 lb. to 25 lb. Revacil per 10,000 product.

*Bracketed text denotes alternate marketing language and use directions.

Product : (continued)	Dosage : (continued)
Preservation of Fresh Animal Hides and Skins	1.0-2.6 lbs. of Revacil per 1,000 lb.s of product.
Cellulosic Materials and Textiles such as cotton, cotton blends, cellulosic materials, and synthetic fibers such as non-wovens, tissues, paper and pulps	Revacil is diluted and applied to give 0.025-2% on the dry weight of the substrate
Oil Recovery	Specific rates for use of Revacil should be determined by bacteriological tests made prior to treatment. Not for use in oil recovery systems that employ holding ponds for spent liquids.
Aqueous Paints and Coatings: such as paper and wood coatings, paints and coatings used for architectural product finishes, industrial finishes and special purpose coatings. Special purpose coating uses: Include use as a : <> preservative for electrodeposition paints or solutions, <> preservative for photoplating solutions or coatings, <> preservative in fount (or fountain) solutions used in the printing process as a maintenance fluid/coating and as a special coating for printing plates, and <> preservative in spin finish coatings for fibers.	5 lb. to 50 lb. Revacil per 10,000 lb. product.

[See Technical Information Bulletin for more detailed list of applications and appropriate dosages.]

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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.

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:)

[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. "Non refillable container. Do not reuse or refill this container."

[Pesticide] Disposal: Securely wrap original container in several layers of newspaper and discard in trash.

NOTICE TO BUYER [AND USER] [- LIMITED WARRANTY FROM MAREVA INC. (PROM)]

Mareva, Inc. (PROM) warrants that this product conforms to the chemical description on the label and that it is reasonably fit for the purposes stated on the label and that it is reasonably fit for the purposes stated on the label when used in accordance with Mareva's (PROM'S) directions under normal conditions of use. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Mareva (PROM) and you as buyer or user assume the risk of any such use. Mareva (PROM) will replace the product or refund the purchase price at your option should this warranty be breached within one year of sale. **THE DURATION OF ANY IMPLIED WARRANTIES UNDER APPLICABLE STATE LAWS SHALL LIKEWISE BE LIMITED TO A PERIOD OF ONE YEAR.**

Some states do not allow limitations on how long an implied warranty lasts, so the above limitations may not apply to you.

IN NO EVENT SHALL MAREVA (PROM) BE LIABLE FOR ANY SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, INCLUDING LOST PROFITS, ON ANY THEORY WHATSOEVER, INCLUDING NEGLIGENCE, and no person is authorized to alter the terms of Mareva's (PROM's) warranty. Some states do not allow the exclusion or limitation of incidental or consequential damages, so the above limitation or exclusion may not apply to you.

For warranty assistance, write Business Manager, [REVACIL (Distributor Product Name), Mareva, Inc. (PROM), 1119 Cavalier Blvd., Chesapeake, VA 23323 (Distributor address) or contact your [product name] [REVACIL] (Distributor Product Name) authorized dealer. This warranty gives you specific legal rights and you may have other rights that vary from state to state.

Deleted:]

Deleted: "Non refillable container. Do not reuse or refill this container."

YOUR AUTHORIZED DEALER GIVES NO WARRANTY IN ADDITION TO MAREVA'S (PROM'S) [WARRANTY] (WARRANTIES) AND DISCLAIMS ALL OTHER WARRANTIES INCLUDING THOSE OF FITNESS OR MERCHANTABILITY.

() Parenthesis denotes alternate text for distributor labels. PROM is used solely for illustrative purposes. Additional distributor names may be substituted for PROM.

"Bracketed text denotes alternate marketing language and use directions.