

March 21, 2005

Eliot I. Harrison
Lewis & Harrison
122 C Street, NW
Suite 740
Washington, DC 20001

Subject: Engelhard Corporation
EC-10
EPA File Symbol No. 70060-20
Application Dates: 7/1/04, 9/21/04, 10/8/04 and 11/5/04
Receipt Date: 7/2/04, 9/22/04, 10/13/04 and 11/08/04

Dear Mr. Harrison:

This amendment submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended to add an outdoor spa use site, is acceptable with the conditions listed below.

Conditions

- 1. Change "All Spa Treatment Programs" to "All Spa Treatment Systems"
- 2. Revise the Ingredient statement to read:

Active Ingredients	
Sodium Chlorite	20.0%
Sodium Dichloroisocyanurate dihydrate	8.0%
Other Ingredients	<u>72.0%</u>
Total	100.0%

- 3. Re-insert the 30-50 ppm levels under the Pool Treatment/Curative directions for use.

General Comments

Based on the findings of this non-dietary occupational/residential handler and post application exposure and risk assessment, there is reasonable certainty of no harm from using the proposed new spa product

CONCURRENCES

SYMBOL	7510C						
SURNAME	Mitchell						
DATE	3-21-05						

when followed by the neutralization treatment. It is expected that the handler exposures will be negligible. The contributing factors are: a low use frequency (i.e., one treatment every 4-6 weeks), low use volume (i.e., one 50 gram tablet), short application exposure time, the use of tablets which reduces inhalation potential to respirable particles, and low volatility.

The study which covered chlorine dioxide and chlorite residual levels present in spa water in support of the outdoor spa use is accepted.

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,

Emily H. Mitchell
Product Manager - Team 32
Regulatory Management Branch II
Antimicrobials Division (7510C)

385

- All text in brackets [xxx] is optional and may or may not be included on a final label.
- All text in braces {xxx} is administrative and will not appear on a final label.

FIRST AID	
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 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 or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling poison control center or doctor, or going for treatment.	
NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate the use of gastric lavage.	

EC-10

FOR USE ONLY IN OUTDOOR SPAS NOT FOR USE WITH INDOOR SPAS

- Kills and removes mold and slime from pool and spa circulation systems.
- Prevents mold and slime growth and formation [in pool and spa circulation systems].
- This product is compatible with [All Spa Treatment Programs] {or} [Chlorine, Bromine, Biguanide and metal ion treatment systems].

Active Ingredients

Sodium Chlorite.....	20.0%
Sodium Dichloroisocyanurate dihydrate.....	8.0%
Inert Ingredients.....	72.0%
Total.....	100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

See [side] {or} [back] panel for first aid and precautionary statements.

EPA Reg. No. 70060-20
EPA Est. No. 70060-

Net Weight: [100 gram tablet - pools]
[50 gram tablet - spas]

Manufactured by:
Engelhard Corporation
Iselin, NJ 08830

PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals

DANGER. Corrosive. Causes irreversible eye damage and skin burns. May be fatal if swallowed or absorbed through skin. Do not get in eyes, on skin or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses), protective clothing and rubber gloves. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS This product is toxic to fish and aquatic organisms.

(If container size is greater than 50 lbs add the following statement:)
Do not discharge effluent containing this product into lakes, streams, ponds, 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 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.

[contains]



ACCEPTED
with COMMENTS
[Aseptrol and the Aseptrol logo are trademarks of Engelhard Corporation]
EPA Letter Dated

MAR 21 2005

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

70060-20

[Sodium Chlorite in this product is from Spain]

4 2 5

- All text in brackets [xxx] is optional and may or may not be included on a final label.
- All text in braces {xxx} is administrative and will not appear on a final label.

Regular use of [this product] {or} [EC-10] kills existing mold and slime in the recirculation system and prevents their re-growth. Mold and slime growth begins in your pool and spa circulation system and can lead to increased consumption of [clarifier] {or} [SoftSwim C] {or} [sanitizer and other spa chemicals], hazy water and unpleasant odors. This product may also be used to treat pool and spa circulation systems that have visible mold and slime. [This product] {or} [EC-10] should be used prior to draining and refilling as part of the cleaning process.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read entire label before applying product and use strictly in accordance with directions and hazard warnings.

PRIOR TO POOL APPLICATION

Ensure that pump and filter equipment are working properly. If necessary, clean the filter equipment by backwashing and/or chemical cleaning. Adjust pH to the range of 7.2 – 7.8. Establish proper levels of [SoftSwim B and SoftSwim C] {or} [biguanide sanitizer and clarifier]. When using other products as outlined in the directions for this product, always follow directions on those products.

POOL DOSING CHART	
Less than 10,000 gallons	1 tablet in skimmer and 1 tablet in hair and lint basket
10,000 gallons or more	2 tablets in skimmer and 2 tablets in hair and lint basket

WHEN USED FOR ROUTINE POOL MAINTENANCE:

INITIAL DOSE

Do not add this product through any automatic dispensing device. Apply product when no persons are in the pool. With the pump turned off, apply appropriate number of tablets (See dosing chart) to the hair and lint basket of the pump. Turn the pump on until primed. Leave pump on for 1 minute and then turn the pump off. Now apply appropriate number of tablets (See dosing chart) in the skimmer basket. Leave pump off at least 6 hours, but no longer than 12 hours. Turn pump on and resume normal pump operation schedule. Wait at least 8 hours before allowing swimmers to enter pool. Application of this product may dislodge deposits from the pool circulation system. To help clear water, apply [a filter aid] {or} [SoftSwim Filter Aid and Flocculent as a filter pad].

ROUTINE MAINTENANCE

Frequency of application is once every 3-4 weeks. Follow initial dose application directions for your pool size.

POOL TREATMENT/CURATIVE:

For pools with a large clarifier demand, hazy water or visible growth of slime and mold, follow the directions below for treatment.

Do not add this product through any automatic dispensing device. Apply product when no persons are in the pool. Brush all visible growth from all areas of pool, giving special attention to steps, skimmers, ladders and light niches. With the pump turned off, apply appropriate number of tablets (See dosing chart) to the hair and lint basket of the pump. Turn the pump on until primed. Leave pump on for 1 minute and then turn the pump off. Now apply appropriate number of tablets (See dosing chart) in the skimmer basket. Leave pump off at least 6 hours, but no longer than 12 hours. Turn pump on and resume normal pump operation schedule. Wait at least 8 hours before allowing

swimmers to enter the pool. Application of this product may dislodge deposits from the pool circulation system. To help clear water, apply [a filter aid] {or} [SoftSwim Filter Aid and Flocculent as a filter aid]. Observe filter pressure and backwash as needed. Reapply filter aid and continue to filter until pool has been filtered for 24 hours. Clean the filter using [SoftSwim Filter Cleaner] {or} [a filter cleaner]. Apply 1 gallon of [SoftSwim C] {or} [clarifier] per 10,000 gallons pool water. Test and apply [SoftSwim B] {or} [biguanide sanitizer] according to the use directions on the label.

Within 5 to 7 days begin maintenance program starting with initial dose above.

PRIOR TO SPA APPLICATION

For use in outdoor spas only. Make certain that the pump, filter and all spa equipment are working properly. Remove all chlorine or bromine-releasing products from spa. [Do not use this product if spa contains an in-line chlorine or bromine-dispensing device that cannot be bypassed]. For best results remove and clean the filter cartridge with a chemical filter cleaner [or by backwashing and/or chemically cleaning sand or DE filters]. Adjust pH to 7.2-7.8. [For best results, chlorine or bromine concentrations should be near 0 ppm before applying this product.] [For biguanide spas, do not apply this product within one week of adding shock (hydrogen peroxide).]

WHEN USED FOR ROUTINE SPA MAINTENANCE:

INITIAL DOSE

Do not add this product to any automatic dispensing device. Do not apply product when persons are in the spa. To apply this product, turn pump off, remove spa cover and remove filters. [Clean filters with a chemical filter treatment.] Apply one 50 gram tablet of EC-10 inside the [filter port] {or} [filter receptacle] {or} [filter housing] {or} [or skimmer basket] and immediately re-cover spa. Leave general area around spa. After 30 minutes, turn pump and circulation jets on for about 5-7 minutes and then turn the pump off. It may be necessary to turn the pump off at the remote cut-off switch to disable all circulation in the spa of this product. Leave pump off for at least 30 minutes, but not longer than 2 hours. Next, remove spa cover and add the entire contents of the 60 gram package of BioGuard ChemOut®. Immediately re-cover spa and turn on pump for approximately 5 minutes. Wait approximately 30 minutes before reusing spa. Replace filters prior to entering spa. Application of this product may dislodge mold and slime growths from the spa circulation system. If substantial dislodging occurs, it may be necessary to drain and refill spa.

ROUTINE MAINTENANCE

Frequency of application is once every 4-6 weeks. Follow Initial Dose application directions. (If container size is 5 lbs or less, add the following statement:)

STORAGE AND DISPOSAL

Store this product in a cool, dry area away from direct sunlight and heat to avoid deterioration and in an area inaccessible to children. Place empty pouch or blister pack and container in plastic bag and discard in trash.

575

- All text in brackets [xxx] is optional and may or may not be included on a final label.
- All text in braces {xxx} is administrative and will not appear on a final label.

WHEN USED FOR SPA REFILL CONDITIONER (PRIOR TO DRAINING AND REFILLING SPA):

Do not add this product to any automatic dispensing device. Do not apply product when persons are in the spa. Draining and refilling your spa with fresh water at regular intervals is highly recommended. Using this product before draining your spa will kill mold and slime in your circulation system. This will help assure a cleaner circulation system when spa is refilled. Follow Initial Dose application directions. Drain and refill spa.

{If container size is greater than 5 lbs add the following statement:}

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store this product in a cool, dry area away from direct sunlight and heat to avoid deterioration.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. 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 instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Place empty pouch or blister pack and container in plastic bag and discard in trash.