

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

70060-20

9/2/2005

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September 2, 2005

Christina M. Swick  
 Agent for Engelhard Corporation  
 c/o Lewis & Harrison  
 122 C St., NW Suite 740  
 Washington, DC 20001

Subject: EC-10  
 EPA Registration No. 70060-20  
 Application Date: August 5, 2005  
 Receipt Date: August 9, 2005

Dear Ms. Swick:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

**Proposed Notification**

- Addition of Patent Number to label

**General Comments**

Based on a review of the material submitted, the following comments apply:

The notification application is acceptable and a copy has been inserted in your file for future reference.

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

Sincerely,

Wanda Y. Henson  
 Product Reviewer (32)  
 Regulatory Management Branch II  
 Antimicrobials Division (7510C)

**CONCURRENCES**

SYMBOL	7510C	7510C					
SURNAME	E. Berg	Hens m					
DATE	9.2.05	9-2-05					



United States  
**Environmental Protection Agency**  
 Washington, DC 20460

Registration  
 Amendment  
 **Other: NOTIFICATION**

OPP Identifier Number  
**265394**

**Application for Pesticide - Section I**

1. Company/Product Number <b>70060-20</b>	2. EPA Product Manager <b>Emily Mitchell</b>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>EC-10</b>	PM# <b>Team 32</b>	
5. Name and Address of Applicant (Include ZIP Code) <b>Engelhard Corporation 101 Wood Ave. Iselin, NJ 08830</b> <b><u>PLEASE SEND ALL CORRESPONDENCE TO</u></b> <b><u>"CONTACT POINT" LISTED BELOW</u></b> <input type="checkbox"/> Check if this is a new address	6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(1), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

Amendment - Explain below.  Final printed labels in response to Agency letter dated \_\_\_\_\_  
 Resubmission in response to Agency letter dated \_\_\_\_\_  "Me Too" Application  
 Notification - Explain below.  Other - Explain below

**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)

**ADDITION OF PATENT NUMBER**

**Notification in Accordance With PR Notice 98-10**

*This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.*

Signature: Christina M. Swick Date: 8/5/05

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
*Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Other _____ <input type="checkbox"/> Stenciled					

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)

Name <b>Christina M. Swick, Lewis &amp; Harrison, 122 C St. NW, #740, Washington DC 20001</b>	Title <b>Agent for Engelhard Corporation</b>	Telephone No. (Include Area Code) <b>(202) 393-3903 x16</b>
---------------------------------------------------------------------------------------------------	-------------------------------------------------	----------------------------------------------------------------

**Certification**  
 I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature <u>Christina M. Swick</u>	3. Title <b>Agent for Engelhard Corporation</b>	6. Date Application Received (Stamped)
4. Typed Name <b>Christina M. Swick</b>	5. Date <b>August 5, 2005</b>	

LEWIS &  
HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 740  
Washington, D.C. 20001

telephone 202.393.3903  
fax 202.393.3906

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August 5, 2005

**HAND DELIVERED**

Document Processing Desk [NOTIF]  
Office of Pesticide Programs (7504C)  
U.S. Environmental Protection Agency  
Room 266A, Crystal Mall 2  
1801 South Bell Street  
Arlington, VA 22202-4501

**ATTENTION: Emily Mitchell  
Product Manager 32**

**SUBJECT: EC-10 (EPA Reg. No. 70060-20)  
Engelhard Corporation  
Notification per PR Notice 98-10**

Dear Ms. Mitchell:

As agent for Engelhard Corporation, I am submitting a Notification pursuant to PR Notice 98-10 for their product, EC-10 (EPA Reg. No. 70060-20). The purpose of this notification is to add a patent number to the product label.

Enclosed, please find the following documents in support of this Notification:

1. Application for Pesticide Notification (OPP ID No. 265394), which includes a signed statement certifying compliance with PR Notice 98-10;
2. One (1) copy of the product label with changes highlighted; and,
3. Two (2) copies of the final printed label.

Insofar as Lewis & Harrison, LLC is acting as both the "Company Official" and "Company Contact," please direct all correspondence directly to us. Furthermore, if you have any questions, or require any additional information, please feel free to contact me by phone at 202-393-3903 ext. 16 or by email at [cswick@lewisharrison.com](mailto:cswick@lewisharrison.com).

Sincerely,

*Christina M. Swick*

Christina M. Swick  
Agent for,  
Engelhard Corporation

Cc: Mike Cochran (Engelhard Corporation)

- 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.

4 8 6

FIRST AID	
<b>If in eyes</b>	<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If swallowed:</b>	<ul style="list-style-type: none"> <li>▪ Call a poison control center or doctor immediately for treatment advice.</li> <li>▪ Have person sip a glass of water if able to swallow.</li> <li>▪ Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>▪ Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>▪ Take off contaminated clothing.</li> <li>▪ Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>▪ Call a poison control or doctor for treatment advice.</li> </ul>
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

(Note to reviewer: The following text will only be included on labels that have spa use directions)

**[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 Systems] {or} [Chlorine, Bromine, Biguanide and metal ion treatment systems].**

### Active Ingredients

Sodium Chlorite.....	20.0%
Sodium Dichloroisocyanurate dihydrate.....	8.0%
<b>Other Ingredients</b> .....	<b>72.0%</b>
<b>Total</b> .....	<b>100.0%</b>

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

Patent: 6,699,404

[contains]



[Aseptrol and the Aseptrol logo are trademarks of Engelhard Corporation]

[Sodium Chlorite in this product is from Spain]

### 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.

- 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.

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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.

<b>POOL DOSING CHART</b>	
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] as needed to obtain a 30 – 50 ppm level.

**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 re-cover spa. Leave general area around spa. After 30 minutes, turn pump and circulation jets on for about 5-7 minutes and turn pump off. It may be necessary to turn pump off at the remote cut-off switch to disable all circulation in the spa of this product. Leave pump off 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.

- 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.

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**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 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.

{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.