

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY - 2 2001

Mark E. Burt, Ph.D.
Regulatory Manager
AVECIA INC.
1405 Foulk Road
P.O. Box 15457
Wilmington, Delaware 19860-5457

Attention: Mark E. Burt, Ph.D.

Subject: **BAQUACIL SWIMMING POOL SANITIZER AND ALGISTAT**
EPA Registration Number 72674-19
Notification Per PR Notice 98-10
Your Notification Dated April 10, 2001

This will acknowledge receipt of your notification for additional advisory statement, "bromine free" to the product labeling, submitted under the provisions of FIFRA section 3c 9. Based on a review of the submitted material, the following comments apply.

This notification is acceptable and the notification has been made a part of the records of this file.

If you have any questions, please contact LaVerne Dobbins at (703) 308-6378.

Sincerely,



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

CONCURRENCES							
SYMBOL	<i>7510C</i>						
SURNAME	<i>Heyward</i>						
DATE	<i>4/24/01</i>						



Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0090, Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 72674-19	2. EPA Product Manager Adam Heyward	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Bauquaci Swimming Pool Sanitizer and Alastat	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) Avecia Inc., P.O. Box 15457 1405 Foulk Road, Wilmington, DE 19850-5457 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
Notification to add the advisory statement, "Bromine Free" to the spa product labeling.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input 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 <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
<i>certification must be submitted</i> 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"/>			
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph Paper glued Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Mark E. Burt	Title Regulatory Manager	Telephone No. (Include Area Code) (302) 477-8129
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.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Manager	
4. Typed Name Mark E. Burt	5. Date April 9, 2001	

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 product is toxic to fish. Do not contaminate water by cleaning of equipment or disposal of wastes.

STORAGE AND DISPOSAL

Pesticide Disposal

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 material such as sand, earth, or sawdust, and shovel into waste container. Remove waste to chemical waste area, and dispose of in accordance with local pollution regulations.

To dispose of excess product, securely wrap original container in several layers of newspaper and discard in trash.

Container Disposal

Do not reuse container. To dispose of empty container, rinse thoroughly before discarding in trash.

NOTICE TO BUYER AND USER — LIMITED WARRANTY FROM AVECIA INC. — Avecia Inc.

("Avecia") 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 when used in accordance with Avecia's instructions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions. Avecia 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 IS LIMITED TO 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 AVECIA BE LIABLE FOR ANY SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES, INCLUDING LOST PROFITS, and no person is authorized to alter the terms of Avecia'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, BaquaSpa, Wilmington, DE 19850. This warranty gives you specific legal rights and you may have other rights which vary from state to state.

BaquaSpa is a trademark of Avecia Limited.

88815L9G

Made in U.S.A.

Sold by Avecia Inc., Wilmington, Delaware 19850

© 1999, Avecia Inc.

For more information, visit our website at www.baquaspa.com



Bromine-Free, Chlorine-Free

BAQUA Spa™



SANITIZER

Active Ingredient: Poly(iminoimidocarbonyliminoimidocarbonyliminohexamethylene hydrochloride) 20%
Inert Ingredients 80%

WARNING: KEEP OUT OF REACH OF CHILDREN.

See back panel for precautionary statements and first aid treatment.

EPA Reg. No. 72674-19

EPA Est. No. 35209-NJ-01

Net Contents: 16 oz. (473 ml)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner other than for which it was intended.

Treating the spa or hot tub:

Important — BaquaSpa Sanitizer is incompatible with chlorinating and brominating chemical products.

Start Up with BaquaSpa Sanitizer:

1. Remove chlorine or bromine source and disconnect feeder. Discontinue use of ionizers and electrochlorinators if present.
2. Drain existing water in spa.
3. Clean spa surface and filter.
4. Fill spa with water.
5. Have your Authorized Dealer of BaquaSpa Sanitizer check your water for proper water balance.
6. After water has been balanced, add BaquaSpa Sanitizer to give a concentration of 50 ppm (1 oz. of product per 150 gallons of spa water).
7. Circulate water 30 minutes, then check BaquaSpa Sanitizer concentration with BaquaSpa™ Test Strips and adjust if necessary.

Normal Spa Maintenance:

1. Every week, check BaquaSpa Sanitizer concentration and pH. Adjust if necessary.
2. The level of BaquaSpa Sanitizer should be maintained between 30 and 50 ppm. When the level of BaquaSpa Sanitizer is 30 ppm or less, add enough BaquaSpa Sanitizer to bring the level up to 50 ppm. The spa's level of BaquaSpa Sanitizer should never be allowed to drop below 30 ppm. To raise the BaquaSpa Sanitizer level 10 ppm, add 0.2 oz. per 150 gallons of spa water.

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 after handling. Wear goggles or face shield when handling concentrate. Keep container closed. May cause allergic skin reactions.

STATEMENT OF PRACTICAL TREATMENT

FOR EMERGENCY INFORMATION, CALL THE POISON CONTROL CENTER NEAREST YOU OR 1-800-286-7850.



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.

NOTIFICATION
Date Prepared: 5-21-01
Prepared By: L. Davy