



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

MAY 8 2002

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. Mark E. Burt
Regulatory Manager
Avecia Inc.
1405 Foulk Road
P.O. Box 15457
Wilmington, DE 19850-5457

Subject: Revised Label
Baquacil Swimming Pool Sanitizer and Algistat
EPA Registration No. 72674-19
Applications Dated March 28 and April 8, 2002

Dear Mr. Burt:

The following amendments, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are acceptable.

Proposed Amendments

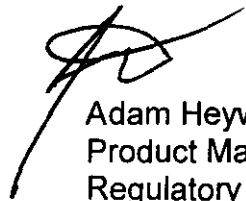
- Amendment to add use directions for the Baquacil Automated Dosing System to the "Master" Label
- Amend the directions for use to add use directions for low volume or "Kiddie Pools"
- Response to EPA letter dated March 6, 2002.

General Comments

A stamped copy of the accepted labeling is enclosed. Submit three (3) copies of your final printed labeling, which include all three amends before distributing or selling the product bearing the revised labeling.

Should you have any questions concerning this letter, please contact me at (703) 308-6422 or Renae Whitaker at (703) 308-7003.

Sincerely,



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

Enclosure

387

(Center Panel)

Chlorine-free
BAQUACIL®
 SWIMMING POOL
SANITIZER AND ALGISTAT

ACTIVE INGREDIENT: POLY
 (IMINOIMIDOCARBONYLIMI-
 NOIMIDOCARBONYLIMINO-
 HEXAMETHYLENE HYDRO
 CHLORIDE).....20%
 INERT INGREDIENTS.....80%
 TOTAL.....100%

SEE SIDE PANEL
 FOR ADDITIONAL
 PRECAUTIONARY
 STATEMENTS.

**KEEP OUT
 OF REACH OF
 CHILDREN
 WARNING**

**Net Contents:
 One Half Gallon (1.89 Liters)**

**ACCEPTED
 with COMMENTS
 in EPA Letter Dated:
 MAY - 8 2002**

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act as
 amended, for the pesticide,
 registered under EPA Reg. No **72674-19**

Pints
1 1/2

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.

2

2 1/2

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 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 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.
MEDICAL EMERGENCY INFORMATION CENTER 1-800-286-7850 Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

ENVIRONMENTAL HAZARDS

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

3

WARRANTY STATEMENT

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, BAQUACIL, Wilmington, DE 19850. This warranty gives you specific legal rights and you may have other rights which

EPA Reg. No. 72674-19

If lot # contains an "A", EPA Est. No. is 058996-MO-001.

If lot # contains an "M", EPA Est. No. is 36209-NJ-01.

If lot # contains a "B", EPA Est. No. is 4091-TN-3

(Right Panel)

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 POOL

POOLS PREVIOUSLY TREATED WITH CHLORINATING CHEMICALS
Important - BAQUACIL SWIMMING POOL SANITIZER AND ALGISTAT ("BAQUACIL SANITIZER") is incompatible with chlorinating chemical products. Consult your Authorized Dealer of BAQUACIL for information on balancing your pool water. Note: If the pool is a plaster pool, add 1 1/4 lbs. of BAQUACIL® METAL CONTROL per 10,000 gallons after the chlorine has been neutralized, and allow pump/filter to operate for 8-12 hours.

Check with chlorine test kit for free and combined chlorine prior to the beginning of neutralization. To destroy chlorine, add BAQUACIL® CHLORINE NEUTRALIZER per label directions or add 1 gallon of BAQUACIL® SHOCK AND OXIDIZER (27% hydrogen peroxide) per 10,000 gallons of pool water. Filter overnight. Check with chlorine test kit. If free chlorine is detected, repeat neutralizer treatment.

FRESHLY FILLED AND DECHLORINATED POOLS

START UP WITH BAQUACIL

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

- Backwash or clean pool filter. Check pool pH, adjust to 7.2-7.8 if necessary.
- Add BAQUACIL SANITIZER to give a content of 50 ppm (1/2 gallon product/10,000 gallons of pool water).
- After 24 hours, check pH and BAQUACIL SANITIZER concentration with BAQUACIL® TEST STRIPS and adjust if necessary.

NORMAL POOL ROUTINE

- Every week, check BAQUACIL SANITIZER concentration and pH.
- Maintain BAQUACIL 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 BAQUACIL SANITIZER level 10 ppm, add 1 pint per 10,000 gallons of water. Consult the booklet, "The Pool Care Guide for BAQUACIL," for calculation instructions.

NOTE: BAQUACIL SANITIZER AND CHLORINE ARE INCOMPATIBLE. Refer to "The Pool Care Guide for BAQUACIL" for information on how to deal with accidental chlorination.

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. (See current "Pool Care Guide" for specific information.) BAQUACIL is not compatible with many detergents and some supplemental algicides (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 BAQUACIL," available from your Authorized Dealer of BAQUACIL.

TREATING SPAS OR HOT TUBS

Important - BAQUACIL SANITIZER is incompatible with chlorinating and brominating chemical products.

Start Up with BAQUACIL 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 BAQUACIL SANITIZER check your water for proper water balance.
6. After water has been balanced, add BAQUACIL SANITIZER to give concentration of 50 ppm (1 oz. of product per 150 gallons of spa water).
7. Circulate water for 30 minutes, then check BAQUACIL SANITIZER concentration with BAQUACIL TEST STRIPS and adjust if necessary.

NORMAL SPA MAINTENANCE

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

TREATING POOLS ON THE BAQUACIL AUTOMATED DOSING SYSTEM START-UP

1. Unscrew the child resistant cap (keep this cap for the possible off-season storage of chemical) and connect to appropriate feed line for the automated system.
2. BAQUACIL Automated Dosing System will deliver an initial dose of 64 oz. per 10,000 gallons to the pool water to obtain an initial reading of 50 ppm.
3. After about 24 hours, take a water sample to your Authorized BAQUACIL Dealer for complete water analysis.

NORMAL POOL MAINTENANCE

1. Once a week, check the BAQUACIL SANITIZER concentration, using the BAQUACIL TEST STRIPS.
2. To insure proper sanitization and protection, maintain your BAQUACIL SANITIZER concentration level between 30 - 50 ppm
3. Once a month take a water sample to your Authorized BAQUACIL Dealer for complete water analysis.

END OF SEASON

Disconnect BAQUACIL SANITIZER container from system and replace child resistant cap. Store in a cool place, in upright position, away from direct sunlight and out of reach of children.

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, 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. FOR INFORMATION ON SPILLS, CALL 1-800-424-2466.

BAQUACIL is a registered trademark of Avecia Limited.

84321L2C

Made in U.S.A.

Manufactured by Avecia Inc. Wilmington, DE 19850

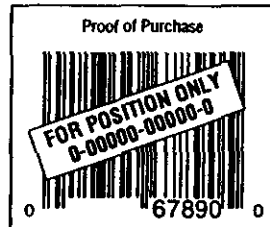
© 2002, Avecia Inc.

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

MEMBER



Proof of Purchase



Pints
1 1/2

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INERT INGREDIENTS.....80%
TOTAL.....100%

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

**KEEP OUT OF REACH OF CHILDREN
WARNING**

Net Contents:
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ACCEPTED
with COMMENTS
in EPA Letter Dated:
MAY - 8 2002

Under the Federal Insecticide,
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687

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TREATING KIDDIE POOLS

1. Fill the pool with fresh water.
2. Add a dose of BAQUACIL SANITIZER. Use the chart below to calculate how much to add.
3. After one minute, test the water with BAQUACIL TEST STRIPS. The color should be in the "OK" range.
4. After one week, drain or discard the water from the pool, scrub poolslides lightly with a soft cloth, rinse the pool and refill with fresh water. Add a fresh dose of BAQUACIL SANITIZER.

Amount of BAQUACIL SANITIZER to Add

Pool volume in gallons	BAQUACIL SANITIZER in teaspoons	BAQUACIL SANITIZER in tablespoons	BAQUACIL SANITIZER in ounces
25	1	1/3	1/8
75	3	1	1/2
100	4	1 1/3	2/3
150	6	2	1
200	8	2 2/3	1 1/3
250	10	3 1/3	1 2/3
300	12	4	2
350	14	4 2/3	2 1/3

NOTES:

1. Grass and soil in the pool will make water cloudy. Minimizing the amount of soil and grass in the pool will help the water to remain clean and reduce the number of refills.
2. Heavy rain may dilute the sanitizer and allow bacteria to grow. After a heavy rain check the sanitizer concentration with BAQUACIL TEST STRIPS. If the pool is still clear but the Test Strip reads "Add," add 1/2 standard dose of sanitizer. Test water with test strip to ensure that sanitizer is within range. If the water is cloudy after a rain you should drain the pool and refill with fresh water.
3. If the water becomes cloudy, drain the pool and refill with fresh water.

STORAGE AND 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, 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.

FOR INFORMATION ON SPILLS, CALL 1-800-424-2466.

MEMBER



NATIONAL SPA & POOL INSTITUTE

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B4321L2C

Made in U.S.A.

Manufactured by Avecia Inc. Wilmington, DE 19850

© 2002, Avecia Inc.

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

Proof of Purchase



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