

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

June 19, 2003

Rosemary Long  
Registration/Business Specialist  
Avecia, Inc.  
1405 Foulk Road  
Wilmington, DE 19850-5457

Subject: Baquacil Swimming Pool Sanitizer and Algistat  
EPA Registration No. 72674-19  
Application Date: May 21, 2003  
EPA Received Date: May 29, 2003

Dear Ms. Long:

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

**Proposed Notification**

- Addition of advisory statement "To be used only with the Baquacil Automated Dosing System."

**General Comments**

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

The notification application is acceptable. 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 703-308-6422.

Sincerely,

*Adam Heyward*  
Adam Heyward  
Product Manager 34

CONCURRENCES Regulatory Management Branch II

SYMBOL	7510C							
SURNAME	Gray							
DATE	6-19-03							



United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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**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) BAQUACIL Swimming Pool Sanitizer and Alcaistat	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) AVECIA INC. 1405 FOULK ROAD, PO BOX 15457 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.)

To add an advisory statement to the basic master product label: "To be used only with the Baquacil Automated Dosing System."

**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) _____
* 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"/> _____	
6. Manner in Which Label is Affixed to Product			<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> 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 Rosemary Long	Title Registration/Business Specialist	Telephone No. (Include Area Code) (302) 477-8133
<b>Certification</b> 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 Registration/Business Specialist	
4. Typed Name Rosemary Long	5. Date May 21, 2003	

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# Avecia

**Avecia Biocides**

1405 Foulk Road, P.O. Box 15457  
Wilmington, Delaware 19850-5457

**Telephone: (302) 477-8000**  
**Fax: (302) 477-8120**

**CERTIFIED MAIL -- RETURN RECEIPT**

May 21, 2003

Adam Heyward, Product Manager 34  
Antimicrobials Division  
C/O Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504C)  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Subject: **BAQUACIL Swimming Pool Sanitizer and Algistat  
EPA Reg. No. 72674-19**  
**■ Notification to Add Advisory Statement to Basic Master Product Label**

Dear Mr. Heyward:

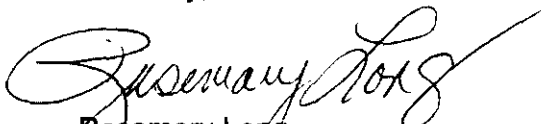
Avecia Inc. wishes to add an Advisory Statement to basic master product label, BAQUACIL Swimming Pool Sanitizer and Algistat. The statement shall read: ***To be used only with the Baquacil Automated Dosing System.*** This advisory statement is added in order to assist consumers in product selection.

Enclosed is a completed EPA Form 8570-1, PR Notice 98-10 certification statement, and five (5) copies of the product labeling with proposed label notification highlighted in yellow.

Please let us know if there are any other questions. I can be contacted at the above address, by phone at (302) 477-8133, or by e-mail at [rosemary.long@avecia.com](mailto:rosemary.long@avecia.com).

Thank you for your cooperation and we look forward to receiving EPA's acceptance of this Notification.

Sincerely,



Rosemary Long  
Registration/Business Specialist

Enclosures

Epaltr/17



ES 22464

**PR NOTICE 98-10 CERTIFICATION STATEMENT**

**PRODUCT: BAQUACIL Swimming Pool Sanitizer and Algistat**

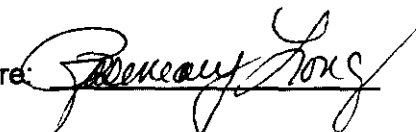
**EPA REG. No: 72674-19**

**REGISTRANT: Avecia Inc.**

**NOTIFICATION TO: Add an Advisory Statement to Basic Master Product Label**

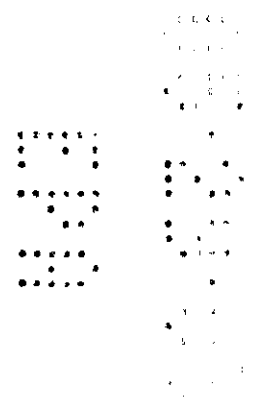
This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false 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.

Company Agent: Rosemary Long

Signature: 

Title: Registration/Business Specialist

Date: May 21, 2003



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.

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FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• 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>
IF ON SKIN OR CLOTHING	<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 center or doctor for treatment advice.</li> </ul>
IF SWALLOWED	<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>
<p><b>MEDICAL EMERGENCY INFORMATION CENTER</b> 1-800-285-7850</p> <p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</p>	

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**ENVIRONMENTAL HAZARDS**

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

**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 ALL 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 vary from state to state.

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

# Chlorine-free BAQUACIL<sup>®</sup> SWIMMING POOL SANITIZER AND ALGISTAT

ACTIVE INGREDIENT: POLY  
(IMINOIMIDOCARBONYLIMI-  
NOIMIDOCARBONYLIMI-  
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)

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#### DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner other than for which it was intended. BAQUACIL can be used in both residential and public swimming pools and spas.

#### 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/filtration 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.

1. Backwash or clean pool filter. Check pool pH; adjust to 7.2-7.8 if necessary.

2. Add BAQUACIL SANITIZER to give a content of 50 ppm (1/2 gallon product/10,000 gallons of pool water).

3. After 24 hours, check pH and BAQUACIL SANITIZER concentration with BAQUACIL® TEST STRIPS and adjust if necessary.

#### NORMAL POOL ROUTINE

1. Every week, check BAQUACIL SANITIZER concentration and pH.  
2. 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.

#### 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	1/6
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.

#### PROBLEM-SOLVING AND SUPPLEMENTAL POOL INFORMATION

Do not use in freestanding spas/hot tubs. Do not use in unpainted 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.
2. 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

To be used only with 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 DANGER  
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

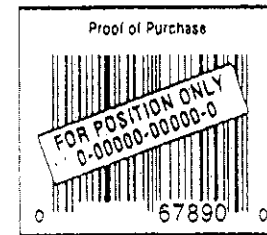
Do not reuse container. To dispose of empty container, rinse thoroughly before discarding in trash.

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

MEMBER



NATIONAL SPA & POOL INSTITUTE



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