

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SEP 24 2001

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

Subject: Revised Label Baquacil Ultra Swimming Pool
Sanitizer & Fungicide
EPA Registration Number 72674-22
Application Dated August 23, 2001

Dear Dr. Burt:

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

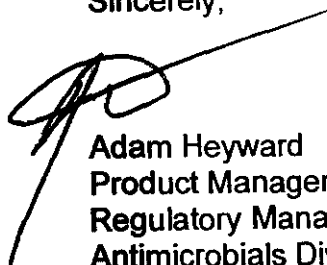
General Comments

- Revised direction for use under the Spa or hot tub label text.

A stamped copy of the acceptable labeling is enclosed. Submit three (3) copies 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 Drusilla Copeland on (703) 308-6224 or Adam Heyward at (703) 308-6422.

Sincerely,



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

Enclosure		CONCURRENCES						
SYMBOL								
SURNAME								
DATE								

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
WARNING**

HARMFUL IF SWALLOWED, INHALED OR ABSORBED THROUGH THE SKIN. AVOID CONTACT WITH SKIN OR CLOTHING. AVOID BREATHING VAPOR OR MIST. CAUSES SUBSTANTIAL BUT TEMPORARY EYE INJURY. DO NOT GET IN EYES. WASH THOROUGHLY WITH SOAP AND WATER AFTER HANDLING. REMOVE CONTAMINATED CLOTHING AND WASH CLOTHING BEFORE REUSE. WEAR GOGGLES OR FACE SHIELD WHEN HANDLING CONCENTRATE. MAY CAUSE ALLERGIC SKIN REACTION.

**FIRST AID
IF IN EYES**

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

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

Call 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 the poison control center or doctor.
Do not give anything by mouth to an unconscious person.

IF INHALED

Move person to fresh air.
If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.
Call a poison control center or doctor for further treatment advice.

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

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 warrant 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.

BAQUACIL is a registered trademark of Avecia Limited.

Made in U.S.A.
Manufactured by Avecia Inc.,
Wilmington, Delaware 19850
© 2001, Avecia Inc.
For more information,
visit our website at
www.baquacil.com



**ACCEPTED
with COMMENTS
in EPA Letter Dated:**

SEP 24 2001

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 72674-22

EPA Reg. No. 72674-22
EPA Est. No. 4091-TN-3

Net Contents: 56 oz. (1.68 Liters)



Active Ingredient: Poly(iminoimidocarbonyl-
liminoimidocarbonyliminohexamethylene
hydrochloride) 20%
Inert Ingredients 80%

**WARNING: KEEP OUT
OF REACH OF CHILDREN.**
See side panel for additional
precautionary statements.

DIRECTIONS FOR USE

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

Converting From Chlorine

If you are using chlorine in your pool, it is important to eliminate the chlorine from the pool since BAQUACIL ULTRA Swimming Pool Sanitizer and Fungicide ("BAQUACIL ULTRA Sanitizer") is incompatible with chlorinating chemicals. Follow these simple steps:

1. Make sure your water is properly balanced. Take a sample of your pool water to your Authorized BAQUACIL Dealer for a complete water analysis. Adjust as necessary following your dealer's recommendations.
2. Use a chlorine test kit to check for the level of free and combined chlorine in your pool.
3. A. If your pool water is clear, add BAQUACIL Chlorine Neutralizer per label directions. Filter overnight.
B. If your pool water is cloudy or algae is present, add one gallon of BAQUACIL Shock and Oxidizer per 10,000 gallons of pool water. Filter overnight.
4. The next morning, check with your chlorine test kit for free and combined chlorine. If free chlorine is detected, repeat steps indicated above.

Freshly Filled, Dechlorinated or BAQUACIL Pools to get started properly with BAQUACIL ULTRA Sanitizer, follow these steps:

1. Backwash or chemically clean your pool's filter with BAQUACIL Filter Cleaner. Check the pool's pH adjusting to a range between 7.2 - 7.8 if necessary.
2. Add BAQUACIL ULTRA System Start-Up following label directions.
3. Add BAQUACIL ULTRA Sanitizer at a rate of 56 oz. per 10,000 gallons of pool water to obtain an initial reading of 50 ppm. Filter overnight.
4. After 24 hours, use BAQUACIL ULTRA Test Strips to check the pool's pH and BAQUACIL ULTRA Sanitizer reading and adjust if necessary.

Normal Pool Maintenance

To properly maintain your pool with BAQUACIL ULTRA Sanitizer during the swimming season, follow these steps on a weekly basis:

1. Once a week, check the BAQUACIL ULTRA Sanitizer concentration, pH and total alkalinity in your pool.
2. Maintain your BAQUACIL ULTRA Sanitizer concentration between 30 and 50 ppm. To insure proper sanitization and protection, the level should never be allowed to drop below 30 ppm. To raise the BAQUACIL ULTRA Sanitizer concentration 10 ppm, add 14 oz. per 10,000 gallons of pool water. Review the weekly maintenance dosage chart found in your BAQUACIL ULTRA Pool Care Guide.
3. Every week, add one pouch of BAQUACIL ULTRA Oxidizer Increaser Tablets per 10,000 gallons of pool water.

Treating the spa or hot tub:

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

Start Up with BAQUACIL ULTRA Sanitizer:

1. Remove chlorine or bromine source and disconnect leader.
2. Drain existing water in spa and clean spa surface and filter.
3. Fill spa with water and have your Authorized Dealer of BAQUACIL ULTRA Sanitizer check your water for proper water balance.
4. After water has been balanced, add BAQUACIL ULTRA Sanitizer to give a concentration of 50 ppm (.67 oz. of product per 100 gallons of spa water).
5. Circulate water 15 minutes, then check BAQUACIL ULTRA Sanitizer concentration with BaquaSpa Test Strips and adjust if necessary.

Normal Spa Maintenance:

1. Every week, check BAQUACIL ULTRA Sanitizer concentration and pH. Adjust if necessary.
2. The level of BAQUACIL ULTRA Sanitizer should be maintained between 30 and 50 ppm. When the level of BAQUACIL ULTRA Sanitizer is 30 ppm or less, add enough BAQUACIL ULTRA Sanitizer to bring the level up to 50 ppm. To raise the BAQUACIL ULTRA Sanitizer level 10 ppm, add 0.25 oz. per 100 gallons of spa water.

PROBLEM SOLVING AND SUPPLEMENTAL POOL INFORMATION

Please remember that BAQUACIL ULTRA Sanitizer and chlorine-based chemicals are not compatible. If you accidentally add chlorine to your swimming pool, refer to the BAQUACIL ULTRA Pool Care Guide for troubleshooting techniques.

Do not use BAQUACIL ULTRA Sanitizer in unpainted plaster pools previously exposed to metals that may cause staining (see BAQUACIL ULTRA Pool Care Guide for specific information). Do not use in free standing spas or hot tubs. BAQUACIL ULTRA Sanitizer is not compatible with many detergents and some algaecides (such as those based on copper). Always check with your Authorized Dealer for compatibility before adding a product that isn't labeled BAQUACIL or BAQUACIL ULTRA. If algae, cloudiness or pool problems develop consult your Authorized BAQUACIL Dealer.

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.

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