

72674-22

6-11-2002

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 11 2002

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

Subject: Notification per PR Notice 98-10
Baquacil Ultra Swimming Pool Sanitizer and Fungicide
EPA Registration No. 72674-22
Application Dated: May 10, 2002
EPA Received Date: May 13, 2002

Dear Mr. Burt:

This letter acknowledges receipt of your notification, submitted in connection with registration under FIFRA 3(c)9 and PR Notice 9-10.

Proposed Notification

- Addition of the Graphic Icon "1.2.3" to the alternate brand name product, Baqua Spa Sanitizer with Stain & Scale Control

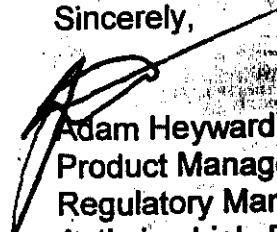
General Comments

Based on a review of submitted materials, the following comment applies:

The application for notification is acceptable and has been placed in the records for this file.

Should you have any questions regarding this letter, please contact me at 703-308-6422.

Sincerely,



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

CONCURRENCES

SYMBOL	7510C						
SURNAME	Heyward						
DATE	6-10-02						

	United States	<input type="checkbox"/> Registration	OPP Identifier Number
	Environmental Protection Agency	<input type="checkbox"/> Amendment	
	Washington, DC 20460	<input checked="" type="checkbox"/> Other	

Application for Pesticide - Section I

1. Company/Product Number 72674-22	2. EPA Product Manager Adam Hayward	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Baqacil Ultra Swimming Pool Sanitizer and Fungicide	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) AVECIA INC. 1405 FOULK ROAD, P.O. 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 checked="" 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 GRAPHIC ICON, "1.2.3" TO THE ALTERNATE BRAND NAME PRODUCT, BAQUA SPA SANITIZER WITH STAIN & SCALE CONTROL.

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
* 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

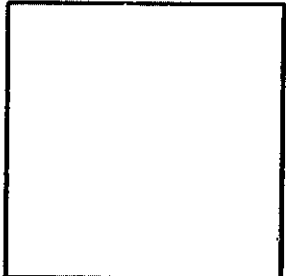
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name MARK E. BURT		Title REGULATORY MANAGER		Telephone No. (Include Area Code) (302) 477-8129	
<p align="center">Certification</p> <p>I certify that the statements 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.</p>					6. Date Application Received (Stamped)
2. Signature 		3. Title REGULATORY MANAGER			
4. Typed Name MARK E. BURT		5. Date MAY 10, 2002			

NOTIFICATION
Date Reviewed: 5.20.02
Reviewed By: A. P. F. C. S.

(Center Panel)

Bromine-Free, Chlorine-Free

BAQUA *Spa.*



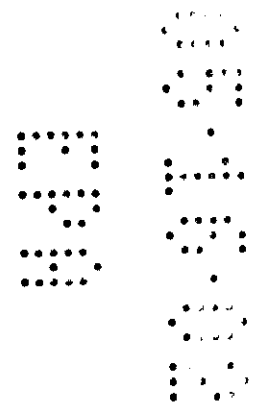
SANITIZER
WITH STAIN & SCALE CONTROL

1.2.3

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

**WARNING: KEEP OUT
OF REACH OF CHILDREN.**
See back panel for precautionary
statements and first aid treatment.

Net Contents: 16 oz. (473 ml)



(Left Panel)

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.

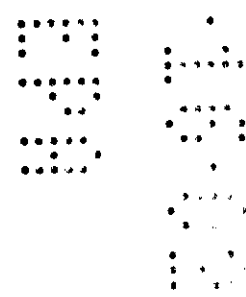
For warranty assistance, write Business Manager, BaquaSpa, Wilmington, DE 19850. This warranty gives you specific legal rights and you may have other rights which vary from state to state.

BaquaSpa is a registered trademark of Avecia Limited. 88865L2C

Made in U.S.A.
Sold by Avecia Inc.
Wilmington, Delaware 19850
© 2002, Avecia Inc

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

EPA Reg. No. 72674-22
EPA Est. No. 36209-NJ-01



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(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 the spa or hot tub:

Important — BaquaSpa Sanitizer With Stain & Scale Control is incompatible with chlorinating and brominating chemical products.

Start Up with BaquaSpa Sanitizer With Stain & Scale Control:

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 check your water for proper water balance.
6. After water has been balanced, add BaquaSpa Sanitizer With Stain & Scale Control to give a concentration of 50 ppm (1 oz. of product per 150 gallons of spa water).
7. Circulate water 15 minutes, then check BaquaSpa Sanitizer concentration with BaquaSpa® Test Strips and adjust if necessary.

Normal Spa Maintenance:

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

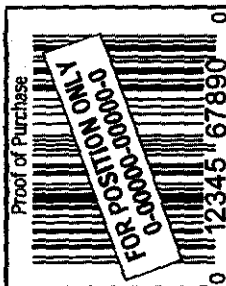
PRECAUTIONARY STATEMENTS

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.

