

72674-32

4/15/2004

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

April 15, 2004

Mark E. Burt
Regulatory Manager
Avecia, Inc.
1405 Foulk Road
Wilmington, DE 19803

Subject: A-Breeze Solid PHMB
EPA Registration No. 72674-32
Application Date: March 12, 2004
EPA Received Date: March 12, 2004

Dear Mr. Burt:

The following amendment, submitted under connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FFIRA), as amended, is acceptable with the conditions listed below:

Proposed Amendment

- Change Primary Product Name to "A-Breeze Solid PHMB"
- Revise Directions for Use

Conditions

Revise the label as follows:

1. On Page 3, revise the "Start-Up for Pools That Are Presently Using A PHMB Sanitizer" directions by including the statement "Turn the pump on when adding **A-BREEZE SANITIZER TABLETS.**"
2. On Pages 4 and 5, revise the "Routine Pool Care" directions by including the statement "Do not swim until sanitizer level reaches a minimum of 6 ppm."

CONCURRENCES

SYMBOL	7512C						
SURNAME	Mark E. Burt						
DATE	4-15-04						

General Comments

A stamped copy of the labeling accepted with conditions 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 me at 703-308-6422.

Sincerely,



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

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A-BREEZE SOLID PHMB

OPTION 1

A-BREEZE SANITIZER CARTRIDGE

[Descriptor for the Cartridge Label: Designed to fit A-BREEZE Feeders]

Net Contents: [One Cartridge – 3.7 lbs.]

OPTION 2

A-BREEZE SANITIZER TABLETS

Net contents (4 x 200g tablets or 800 g total)

Active Ingredient: Poly(iminoimidocarbonyliminoimidocarbonyliminohexamethylene hydrochloride).....96.3%
 Inert ingredients.....3.7%
 Total.....~~100.0%~~

ACCEPTED
 with **COMMENTS**
 EPA Letter Dated:

KEEP OUT OF REACH OF CHILDREN

APR 15 2004

PRECAUTIONARY STATEMENT

Hazard to Humans and Domestic Animals

Under the Federal Insecticide, Fungicide and Fertilizer Act as amended for the pesticide, registered under EPA Reg. No. **7267432**

DANGER

Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes or on clothing. Wear protective eyewear such as goggles, face shield, or safety glasses. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or, using the bathroom. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

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 first 5 minutes, then continue rinsing. • 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 do so. • 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. • Probable mucosal damage may contraindicate the use of gastric lavage.
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.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
MEDICAL EMERGENCY INFORMATION CENTER 1-800-286-7850	

4 7 8

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 the 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, **A-BREEZE**, Avecia, 1405 Foulk Rd, Wilmington, DE 19803. This warranty gives you specific legal rights and you may have other rights, which vary from state to state.

EPA Reg. No. 72674-32
EPA Est. No. _____ - _____ - _____

DIRECTIONS FOR USE

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

CONVERSION OF POOLS PREVIOUSLY TREATED WITH CHLORINE

DECHLORINATION

Important – **A-BREEZE SANITIZER** is incompatible with chlorinating chemical products.

1. Check free and combined chlorine levels with chlorine test kit prior to the beginning of neutralization.
2. Add **A-BREEZE CHLORINE NEUTRALIZER** per label directions to eliminate chlorine from pool water, and filter overnight.
3. Check chlorine levels with chlorine test kit. If free chlorine is detected, repeat step 2 of treatment.

Note: For plaster pools, add 1-¼ lbs (1 bottle) of **A-BREEZE METAL REMOVING AGENT** per 10,000 gallons of pool water after the chlorine has been neutralized, and allow pump/filter to operate for 8-12 hours.

If the pool water contains algae or is hazy, consult the problem-solving section of “The Pool Care Guide for **A-BREEZE**,” available from your Authorized **A-BREEZE** Dealer. Backwash or clean pool filter. Check the pH level and adjust to 7.2-7.8 if necessary. Consult your Authorized **A-BREEZE** Dealer for information on balancing your pool water.

Once pool has been dechlorinated go to section for START-UP FRESHLY FILLED AND DECHLORINATED POOLS.

{This section of directions will only appear on A-BREEZE SANITIZER TABLETS}

START-UP FRESHLY FILLED AND DECHLORINATED POOLS

1. With pump on, add **A-BREEZE SANITIZER TABLETS** according to the chart below to provide a sanitizer level between 6 to 10 ppm. To add **A-BREEZE SANITIZER TABLETS**, cut each pouch and add tablet to pool skimmer.
2. Do not add anymore than 4 tablets per skimmer at any given time. For larger pools requiring more than 4 tablets initially add 4 tablets to the pool skimmer then add remaining tablets when original tablets are no longer visible. This may take about 6 –12 hours with pump running.

START-UP DOSAGE

Pool Volume (gallons)	No. of TABLETS for Start-up
7,500	1
10,000	2
12,500	2
15,000	3
17,500	3
20,000	4
22,500	4
25,000	5
27,500	5
30,000	6
32,500	6
35,000	7
37,500	7
40,000	8

3. After 24 hours, check pH, total alkalinity and sanitizer levels with **A-BREEZE TEST STRIPS**. If the sanitizer level is at or below 6 ppm, add **A-BREEZE SANITIZER TABLETS** to the skimmer according to the Top-Up Chart in the "ROUTINE POOL CARE" section below to bring the level to 6 to 10 ppm. Do not swim until sanitizer level reaches a minimum of 6 ppm.

START-UP FOR POOLS THAT ARE PRESENTLY USING A PHMB SANITIZER

1. Check pH, total alkalinity and sanitizer level with **A-BREEZE TEST STRIPS**.
2. If the sanitizer level is at or below 6 ppm add **A-BREEZE SANITIZER TABLETS** to provide a level of between 6 to 10 ppm. Do not swim until sanitizer level reaches a minimum of 6 ppm.
3. After 24 hours, re-check pH, total alkalinity and sanitizer level with **A-BREEZE TEST STRIPS**.
4. If the sanitizer level is at or below 6 ppm or less repeat steps 2 and 3.

ROUTINE POOL CARE

1. Each week, using **A-BREEZE TEST STRIPS** check pH, total alkalinity and sanitizer level.
2. Maintain sanitizer level between 6 to 10 ppm. If sanitizer level is at or below 6 ppm, add a top-up dose using **A-BREEZE SANITIZER TABLETS** according to the chart below to bring the level between 6 to 10 ppm. Turn the pump on when adding **A-BREEZE SANITIZER TABLETS**.

TOP-UP DOSAGE

Pool Volume (gallons)	No. of TABLETS for Top-up
7,500	1
10,000	1
12,500	1
15,000	1
17,500	2
20,000	2
22,500	2
25,000	2
27,500	2
30,000	3
32,500	3
35,000	3
37,500	3
40,000	4

3. Once per month take a water sample to an Authorized A-BREEZE Dealer for complete water analysis.

{This section of directions will only appear on A-BREEZE SANITIZER CARTRIDGE}

START-UP FOR POOLS THAT ARE PRESENTLY USING A PHMB SANITIZER

1. Add the **A-BREEZE SANITIZER CARTRIDGE** to the **A-BREEZE FEEDER** and turn the pump on.
2. Check pH, total alkalinity and sanitizer level with **A-BREEZE TEST STRIPS**. If the sanitizer level is at or below 6 ppm add **A-BREEZE SANITIZER TABLETS** to provide a level of between 6 to 10 ppm. Do not swim until sanitizer level reaches a minimum of 6 ppm.
3. After 24 hours, re-check pH, total alkalinity and sanitizer level with **A-BREEZE TEST STRIPS**.
4. If the sanitizer level is at or below 6 ppm or less repeat steps 2 and 3.

ROUTINE POOL CARE

1. Each week, using **A-BREEZE TEST STRIPS** check pH, total alkalinity and sanitizer level.
2. Maintain sanitizer level between 6 to 10 ppm. If sanitizer level is at or below 6 ppm, add a top-up dose using **A-BREEZE SANITIZER TABLETS** according to the chart below to bring the level between 6 to 10 ppm. Turn the pump on when adding **A-BREEZE SANITIZER TABLETS**.

TOP-UP DOSAGE

Pool Volume (gallons)	No. of TABLETS for Top-up
7,500	1
10,000	1
12,500	1
15,000	1
17,500	2
20,000	2
22,500	2
25,000	2
27,500	2
30,000	3
32,500	3
35,000	3
37,500	3
40,000	4

3. Adjust the dial setting on the feeder to maintain a sanitizer level between 6 to 10 ppm.
4. If the **A-BREEZE SANITIZER CARTRIDGE** is empty, turn the pump off. Replace the empty **A-BREEZE SANITIZER CARTRIDGE** with a new one and turn on the pump.
5. If sanitizer level is higher than 10 ppm, turn off feeder until level drops below 10 ppm.
6. Once per month take a water sample to an Authorized **A-BREEZE** Dealer for complete water analysis.

POOL CLOSING

{This section of directions will only appear on A-BREEZE SANITIZER TABLETS}

1. Using **A-BREEZE TEST STRIPS** check pH, total alkalinity and sanitizer level.
2. Adjust sanitizer level to 10 ppm by adding a top-up dose using **A-BREEZE SANITIZER TABLETS**.
3. Close pool per pool manufacturer's recommendations.

PROBLEM-SOLVING AND SUPPLEMENTAL POOL INFORMATION

If algae development, cloudiness, or pool problems occur or additional information on water quality is desired, consult "The Pool Care Guide for **A-BREEZE**," available from your Authorized **A-BREEZE** Dealer.

A-BREEZE SANITIZER is incompatible with chlorinating chemical products, many detergents and some supplemental algicides (such as those based on copper).

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal

STORAGE

Store in a cool, dry place. Keep container closed when not in use. Store in original container in an area inaccessible to children.

DISPOSAL

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

A-BREEZE is a registered trademark of Avecia Limited.

Made in U.S.A.

Manufactured by
Avecia Inc.
Wilmington, DE 19803

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

NOTE: Bracketed [] information is optional text/picture/diagram. Text separated by a comma (,) denotes – and/or-options. {Bracketed Text} is for administrative purposes only and will not appear on the printed label.

