

74849-3

08/28/2008

1/4

FILE COPY

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



Office of Pesticide Programs

August 28, 2008

Marianne Radtke
Advantis Technologies, Inc.
W175 N11163 Stonewood Drive
Suite 234
Germantown, WI 53022

Subject: Ultima Platinum Plus
EPA Registration No. 74849-3
Application Dated: July 23, 2008
Receipt Date: July 29, 2008

Dear Ms. Radtke:

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

General Comments

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

This notification to insert an omitted statement and add marketing text to the label 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) 308-6345.

Sincerely,


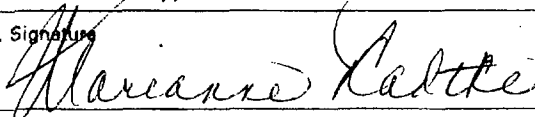
A handwritten signature in black ink, appearing to read "Wanda Henson".

Wanda Henson
Product Reviewer - Team 32
Regulatory Management Branch II
Antimicrobials Division (7510P)

2/4

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0080. Approval expires 2-28-95

 United States Environmental Protection Agency Washington, DC 20460		<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide - Section I			
1. Company/Product Number 74849-3		2. EPA Product Manager Emily Mitchell	
4. Company/Product (Name) Ultima Platinum Plus		3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include ZIP Code) Advantis Technologies, Inc. W175 N11163 Stonewood Dr. Ste 234 Germantown, WI 53022 <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.) Attached is an application for notification of a statement that was omitted on the label sent in and provides guidance to user. Also 2 additional marketing bullets. 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.			
Section - III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input checked="" 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 checked="" type="checkbox"/> Container		4. Size(s) Retail Container 2#, 8#, 40#	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 checked="" type="checkbox"/> Other screenprinting	
Section - IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Marianne Radtke		Title Regulatory Affairs Manager	Telephone No. (Include Area Code) 262 2565 4449 ext 328
Certification 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 Regulatory Affairs Manager	
4. Typed Name Marianne Radtke		5. Date 7/23/2008	



GLB Pool & Spa
Robarb
Quantum
Advantis Technologies, Inc.

Applied Biochemists
Leisure Time
Aquashade

W175 N11163 Stonewood Drive Suite 234
Marianne Radtke, Regulatory Services
Germantown, WI 53022-4799
262 255-4619 Fax
262 255-4449 ext. 328
E-mail: mradtke@advantistech.com

July 23, 2008

U.S. Environmental Protection Agency
Office of Pesticide Programs (NOTIF)
Antimicrobials Division (7504P)
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Ultima Platinum Plus
EPA Reg. No. 74849-3
Notification Attached
Attn: Emily Mitchell
Product Manager #32

Dear Ms. Mitchell,

We recently registered our label for Ultima Platinum Plus and was approved on 7/2/2008. Since then as I was reviewing the approved label to make sure the market label had all the corrections the were specified in your approval letter I noticed that a sentence mistakenly was omitted. In my opinion the sentence is an advisory statement that would help the end user use the product correctly. That sentence will be found in the "FOR MAINTENANCE APPLICATION AND WINTERIZING" section. It is the last sentence in the paragraph. The omitted sentence is "Platinum Plus levels should be tested once a month and maintained at a level of 30 – 50 ppm." It is added on the master label attached and the final printed labels with the revisions made as required in your letter. I have also added 3 marketing claims to replace those that were not allowed.

I hope you will agree that the sentence that was missing is an important piece of information for the user of this product and will allow this notification.

Attached you will find:

Form 8570-1 for Notification

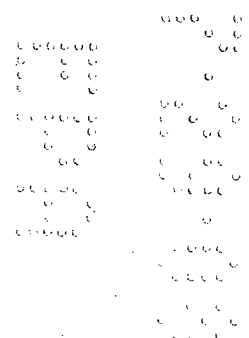
Copy of Master Label Approved 7/2/08 along with statements requested above
w/requested notification statements highlighted on Master label.

3 Copies of the market labels with corrections as listed in approval letter and omitted sentence added.

If you have any questions or require further information please be in touch with me.

Sincerely,

Marianne Radtke
Regulatory Affairs Manager
800-558-5106 ext 328
262 255 4449 ext 328
262 255 4619 fax
mradtke@advantistech.com



4/4

ULTIMA[®]

PLATINUM PLUS

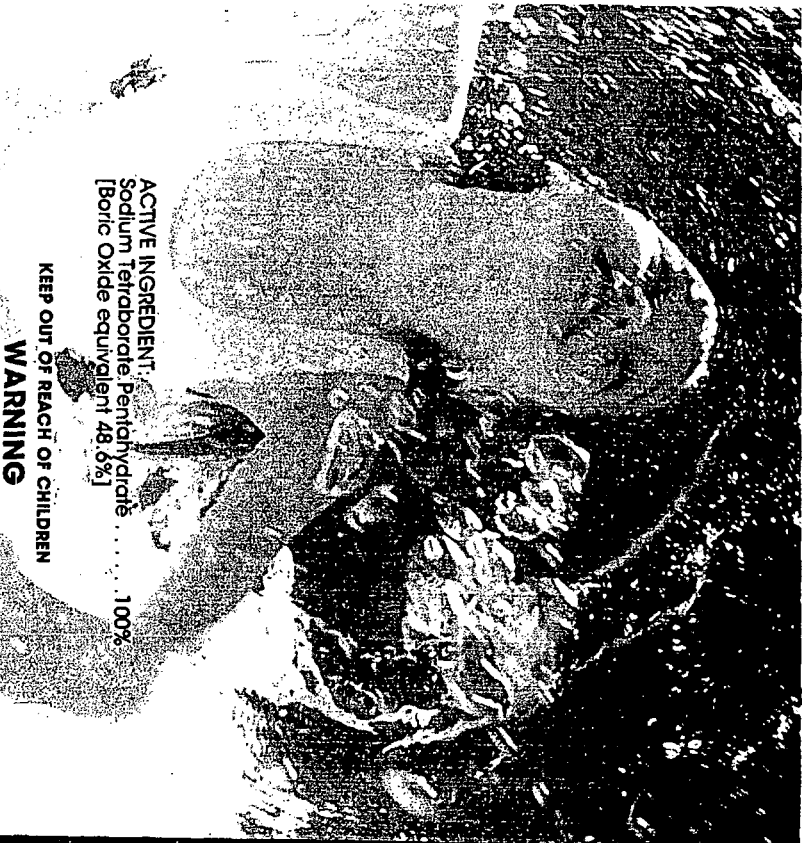
- Clarifies water by improving filtration
- Conditions water making it feel softer
- Controls algae growth

ACTIVE INGREDIENT:
Sodium Tetraborate Pentahydrate 100%
[Boric Oxide equivalent 48.6%]

KEEP OUT OF REACH OF CHILDREN
WARNING

See other precautions and first aid on back panel.

NET WT. 2 LB. (906 g)



DIRECTIONS FOR USE:

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

FOR INITIAL APPLICATION IN POOLS: Sanitize with bromine, chlorine and biguanide (PHMB), backwash and clean filter. Balance your pool water and adjust pH between 7.2 - 7.6. Add 2 lbs of Platinum Plus per 1,000 gallons of pool water by broadcasting the product over the surface of the pool with the pump running.

This initial treatment should be added in three doses with one third of the required amount being added with each application. Brush any undissolved product from the bottom of the pool. The pH of the water will rise as a normal reaction to the introduction of Platinum Plus. One hour after each application, adjust the pH to 7.2 - 7.6 with pH decreaser according to label directions. Allow at least 8 hours between the applications of Platinum Plus. Do not add additional products until the pH is between 7.2 - 7.6 (NOTE: For every 2 lbs of Platinum Plus, approximately 1 lb of pH decreaser will be required for pH adjustment). Within 10 days, take a water sample to your dealer to test for water balance and to determine if an adequate amount of this product has been added.

FOR MAINTENANCE APPLICATION AND WINTERIZING: This product is stable in pool water and not degraded by sunlight. The primary loss of product is through splash-out, backwashing and dilution from heavy rains. Therefore, once the initial application is made, minor and infrequent additions would be all that is required unless a substantial amount of water is drained from the pool. Platinum Plus levels should be tested once a month and maintained at a level of 30 - 50 ppm.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if swallowed. Do not get in eyes or on clothing. Wear goggles or face shield (safety goggles). Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse. Avoid contamination of food or feed.

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 SWALLOWED: 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 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.

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.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-222-1222 for emergency medical treatment.

PHYSICAL OR CHEMICAL HAZARDS: Do not mix with other chemicals. Do not add through skimmer. Do not add to any dispensing device.

ENVIRONMENTAL HAZARDS: Keep out of lakes, ponds or streams. Do not contaminate water by cleaning of equipment or disposal of wastes.

STORAGE AND DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Keep this product dry in original tightly closed container until use. Store in a cool, dry, well ventilated area away from heat or open flame. Do not reuse container, but place in trash collection. Rinse thoroughly before discarding in trash. Do not store where children or animals may gain access.

EPA Reg. No. 74849-3
EPA Est. #42291-GA-1

UltimaPool.com
Advantis Technologies, Inc.
1400 Bluegrass Lakes Pkwy.
Alpharetta, GA 30004

