

# Board of Pesticides Control

## Report to the 130th Maine State Legislature on LD 264 Resolve, Directing the Board of Pesticides Control to Gather Information Relating to Perfluoroalkyl and Polyfluoroalkyl Substances in the State

### LEGISLATIVE REPORT FISCAL YEAR 2021



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# Contents

I. Acronyms and Definitions .....	3
II. Introduction .....	4
A. Summary of Completed and Ongoing Activities .....	5
B. PFAS and Pesticides .....	5
III. Activities Related to Amending Rules.....	7
IV. Sale and Use of Fluorinated Adjuvants Used in Maine.....	7
A. Identification of Fluorinated Spray Adjuvants .....	8
B. Results from Survey of Other States .....	9
C. Methods for Identifying Specific Pesticide and Spray Adjuvant Ingredients as PFAS .....	10
D. State Regulatory Agency Adjuvant Survey Results.....	11
V. What is Needed to Regulate Fluorinated Spray Adjuvants?.....	13
VI. A Feasible Definition of PFAS Adulteration.....	16
VII. What Is Necessary to Prohibit Distribution and Application of Pesticides & Adjuvants Containing PFAS? .....	19
Appendix A LD 264 Bill Text.....	22
Appendix B EPA Email Response Clarifying Risk Assessments For Adjuvants and Spray Adjuvants .....	23
Appendix C List of Registered Adjuvant Products in Other States (Arkansas, Tennessee, & Washington) .....	25
Appendix D Email From Washington State Registrar On Adjuvant Registration.....	43
Appendix E Lists of PFAS Definitions .....	44

## I. Acronyms and Definitions

Adjuvant	A chemical added to a pesticide product to enhance or stabilize the product's performance.
BPC	Board of Pesticides Control
CIASA	Constituents ineffective as spray adjuvants; the portion of an adjuvant that is effectively equivalent to the inert/other constituents of registered pesticide
CSF	Confidential Statement of Formula
DACF	State of Maine Department of Agriculture, Conservation, and Forestry
DEP	State of Maine Department of Environmental Protection
DFAS	Defense Financial Accounting Service
EPA	U.S. Environmental Protection Agency
FFDCA	Federal Food Drug and Cosmetics Act
FIFRA	Federal Insecticide Fungicide and Rodenticide Act
HDPE	High Density Polyethylene
Inert	The constituents of a pesticide product that are not specifically acting to control the pest. Synonymous with 'other' ingredients.
LD	State of Maine Legislative Document
MEPRLS	Maine Pesticide Enforcement, Registration & Licensing System
OECD	Organization for Economic Co-operation and Development
OPP	EPA's Office of Pesticide Programs
OPPT	EPA's Office of Pollution Protection and Toxics
Other	The constituents of a pesticide product that are not specifically acting to control the pest. Synonymous with 'inert'.
PFA	Primary Functioning Agent. PFAs are the term of art used to identify the "active ingredient" in spray adjuvant products while simultaneously avoiding confusion with the term "active ingredient". PFAs are the portion of the spray adjuvant responsible for the effects of the spray adjuvant.
PFAS	Per and poly fluoroalkyl substances
Spray Adjuvant	A term used in this report to delineate the products sold separately from registered pesticide products which function to enhance or stabilize the performance of the pesticide. These products are frequently mixed with the registered pesticide product at the time of application.
TSCA	Toxic Substances Control Act

## II. Introduction

In 2021, the Maine Legislature passed LD 264, Resolve, Directing the Board of Pesticides Control to Gather Information Relating to Perfluoroalkyl and Polyfluoroalkyl Substances in the State. One of the two major provisions of the bill directed the Board of Pesticides Control (BPC) to amend its rules relating to the registration of pesticides and require submission of two affidavits. The affidavits address 1) the use of fluorinated high-density polyethylene containers for storing, distributing and packaging pesticide products and 2) the inclusion of perfluoroalkyl or polyfluoroalkyl (PFAS) substances in the formulation of the pesticide product.

The second provision directed the Board to gather information relating to PFAS substances with a specific focus on developing 1) the framework necessary to regulate fluorinated adjuvants, 2) the framework necessary to prohibit the distribution and use of pesticides and adjuvants containing PFAS substances, and 3) a feasible definition of PFAS adulteration in a pesticide.

This report summarizes the BPC activities and findings. Specifically, the report summarizes the implementation of the required affidavits; findings on what is needed to regulate spray adjuvants (and thus fluorinated spray adjuvants); findings on how to prohibit distribution and use of pesticide and adjuvant products containing PFAS; and findings on how to define PFAS adulteration in pesticide products.

### A. Constraints and Demands on Resources

LD 264 was passed with no additional funding to support BPC activities relating to its implementation. The Department of Agriculture, Conservation, and Forestry (DACF) and EPA have committed PFAS related funds and multipurpose grant funding, respectively, allowing the development of key components originating from this resolve. At the time of this writing, approximately \$75,000 has been committed for web development for implementation of the required affidavits and collection and flagging of related product formulation information. An additional \$4,800 has been used to support a part-time student assistant (approximately 320 hours). Within the BPC, work on this resolve has extensively included the Director and the Pesticides Toxicologist, and also involved the Pesticides Registrar, the Policy & Regulations Specialist, and the Certification & Licensing Specialist. Meetings with personnel outside of the BPC office involved staff from EPA Region 1, DACF, DEP, and the Office of the Maine Attorney General. Additionally, this topic has been discussed at each of the 2021 meetings of BPC's public policy board.

## B. Summary of Completed and Ongoing Activities

In response to LD 264, the BPC has performed the following activities further described in this report. Throughout the course of this project, staff have:

- developed affidavit language and consulted with the BPC's legal representation for appropriateness;
- researched, planned, and will now work with software programmers to add functionality to the existing registration platform to incorporate the PFAS affidavits starting with the 2022 registration year;
- added functionality of the existing registration platform to collect confidential statements of formula (CSF) for pesticide and, in the future, adjuvant products;
- collected information from other states on the registration of spray adjuvants;
- analyzed statutes, rules, and regulations from Maine and other states in order to identify mechanisms of gaining authority to regulate spray adjuvants;
- collected lists of registered spray adjuvants from those states that collect registrations on spray adjuvants;
- added/commissioned functionality of our existing registration platform to collect spray adjuvant registrations, fees, and CSF data;
- explored definitions of PFAS and PFAS adulteration;
- determined limits of BPC enforcement authority in cases of PFAS adulteration;
- communicated with pesticide repackaging entities in the state about repackaging activities related to the use of fluorinated HDPE containers in product distribution;
- communicated with DEP staff concerning overlap with LD 264 and LD 1503, An Act To Stop Perfluoroalkyl and Polyfluoroalkyl Substances Pollution;
- identified several currently registered pesticide active ingredients that meet the definition of PFAS established in LD 1503; and
- identified areas of concern for implementation of LD 264 due to ambiguity in interpreting the definition of PFAS.

## C. PFAS and Pesticides

LD 264 focused on the potential nexus between pesticides and PFAS due to the detection of PFAS in one pesticide product utilized for mosquito control in Massachusetts.

Ultimately, it has been determined that the underlying pesticide formulation does not contain PFAS, nor does the HDPE container that it is packaged within. However, because the container underwent further fluorination treatment by a third party (to prevent container degradation), this process appears to be the source of PFAS compounds found in the sampled pesticide product. As a result, EPA is investigating container fluorination, possible leaching of PFAS, the conditions under which this is likely to occur, and the toxicological significance of the potential leachates.

The insecticide in question in Massachusetts is manufactured by Clarke Mosquito Control. The product is called Anvil 10+10 ULV. In 2018, BPC had one Clarke product registered under the name Anvil—Anvil 10+10 ULV. According to BPC distribution records this product appeared to have been purchased by an entity within Maine (Defense Finance and Accounting Service (DFAS) at Loring Air Force Base in Limestone, Maine), however following investigation, BPC staff have determined that the product invoice was paid by DFAS but shipped directly from Clarke to Altus Air Force Base in Altus, Oklahoma.

In 2021, BPC had two Clarke products registered—Duet Dual-Action Adulticide and Natular DT. Natular DT is a solid tablet packaged in a blister pack and is a ready-to-use larvicide applied directly to water. It is not to be applied via aerial application, and Clarke has indicated that it is not packaged in fluorinated HDPE containers. The sole purchase in Maine of Duet Dual-Action Adulticide was in 2019 by DFS at Loring Air Force Base, and the product was again shipped directly from Clarke to Altus Air Force Base.

Later in 2021, EPA was made aware of PFAS detected in another mosquito control product used in Maryland—Permanone 30+30—manufactured by Bayer. In response to this information, EPA applied its new 2021 internally validated oily matrix method to analyze three stored samples of mosquito control pesticide products (Permanone 30-30 and PermaSease 30-30) and determined that none of the tested samples contained PFAS at or above the Agency's method limit of detection.

It is important to stress that the initial and emerging studies of the Clarke Mosquito Control product links PFAS contamination to containers, not the pesticide formulation. The current science and testing around PFAS leaching due to fluorinated HDPE containers continues to evolve. The BPC staff are actively engaged on this broad topic with colleagues in state pesticide programs, EPA Region 1, and is routinely briefing the BPC board on developments at its monthly meetings.

PFAS detection in pesticide formulations is a whole new area of consideration, investigation, and response, beyond the current issues the Department has already been navigating related to PFAS impacted farms. Information will continue to emerge that will help shape and identify BPC's role related to PFAS. This report reflects BPC staff's current understanding of PFAS and pesticides, the applicability and limitations of current authority, and the applicability of parallel regulations.

### III. Activities Related to Amending Rules

#### A. Affidavits

Section 1 of LD 264 directs the Board to conduct rulemaking to amend the requirements for pesticide product registration and collect affidavits relating to PFAS. These new affidavits will provide attestation to the following:

- 1) *whether a perfluoroalkyl or polyfluoroalkyl substance is in the formulation of the registered pesticide*
- 2) *whether the registered pesticide has ever been stored, distributed, or packaged in a fluorinated high-density polyethylene container*

BPC staff have worked with the web development company Stratosphere to allow incorporation of affidavits into the BPC's existing product registration software solution. Following completion of rulemaking and software development, these affidavits will be compulsory questions in the annual pesticide registration process required for lawful distribution of pesticide products in Maine. In addition, BPC staff are developing a new webpage that offers registrants information about these affidavits. Specifically, registrants are directed to the definition of PFAS established by LD 1503 and provided contact information for the Maine Department of Environmental Protection (DEP).

During the affidavit process pesticide registrants will answer the question, "is this product delivered in bulk to any vendors?" The MEPERLS database will flag affirmative entries for follow up by staff. Thus far, BPC staff have identified six vendors that may refill ("repackage") bulk pesticide containers in Maine. BPC staff are in the process of reaching out to these EPA registered Pesticide Producer Establishments in Maine to discuss this issue.

### IV. Sale and Use of Fluorinated Adjuvants Used in Maine

The basic definition of an adjuvant is an ingredient that enhances the effectiveness of pesticide product ingredients or modifies the actions of those pesticide product ingredients. With pesticides, adjuvants are added to enhance the pesticide's performance. This report focuses on adjuvants sold separately from the registered pesticide products, those that are added to a tank mix prior to application. The term "fluorinated adjuvants" used in L.D. 264 is not defined, and it is not a term utilized in pesticide terminology. For the purposes of this report, staff have assumed fluorinated adjuvants to contain 1) primary functioning agents or 2) constituents ineffective as spray adjuvants (CIASAs) that could, under Maine's definition of PFAS (described in section VI below), be considered PFAS.

Adjuvant products are not currently regulated by any federal or State of Maine government entity. Determining if fluorinated adjuvants are definitively present in the state requires access to information to which the BPC is not currently lawfully entitled. Based on BPC staff research, the assumption is that fluorinated adjuvants are potentially available for sale and use in Maine. This assumption is based on the discovery that in some states adjuvants are registered and as many as 1,100 adjuvant products are registered annually. The EPA Master List of PFAS chemicals indicates approximately twenty of the inert/other chemicals known to occur in registered pesticide products may be available for use as ingredients in adjuvant products. BPC has not confirmed the presence of any specific fluorinated adjuvant products for sale or use in the State of Maine.

The BPC regulates pesticide products. Pesticide products must be registered by the EPA prior to being allowed on the market but only following an acceptable risk assessment. Pesticide products, as sold, are almost never composed of 100% pesticide active ingredient, most also include inert/other ingredients. The inert/other ingredients used as part of the pesticide product must also undergo a separate risk assessment prior to being allowed for use in registered pesticide products. This section does not apply to those adjuvants already assessed by EPA as part of pesticide products.

As stated, adjuvants are not currently regulated in Maine or in a majority of the states. Research indicates that nine states do regulate adjuvants and that two of those states require a statement of the complete ingredient list, otherwise known as a confidential statement of formula.

## A. Identification of Fluorinated Spray Adjuvants

### *i. Definition of Spray Adjuvants*

A spray adjuvant is added to a pesticide spray mixture to enhance the pesticide's performance and/or the physical properties of the spray mixture. Because spray adjuvants have no pesticidal properties (they do not control the pest), they are not required to be registered by the U.S. Environmental Protection Agency (EPA). However, if they are to be used on a food or feed crop, there must be an established tolerance or tolerance exemption for the adjuvant. Tolerances are the legal maximum amount of a chemical that are allowed to be on a food commodity at the point of sale. The process of establishing a tolerance involves understanding sufficient toxicology and chemical fate data in order to complete a risk assessment to demonstrate at what concentration exposure to the chemical would not cause undue harm to humans or the environment.

### *ii. Adjuvants Used on Food Crops*

Spray adjuvant products to be used on food commodities are required to either have an established tolerance or be exempt from tolerance requirements as required by



Federal Food, Drug and Cosmetic Act (FFDCA), available as per Code of Federal Regulations (CFR) 40 CFR 180. Tolerances are searchable in the CFR at: <https://www.ecfr.gov/current/title-40> by entering the chemical name into the search function. The majority of inert ingredients can be found in 40 CFR 180.910-180.960.

### *iii. Adjuvants Used on Application Sites Other Than Food Crops*

Spray adjuvant products not used on consumable goods are regulated under Toxic Substances Control Act (TSCA). Approval under TSCA requires EPA to review chemicals ensure that chemicals do not present unreasonable risk of injury to health or the environment when used as proposed. Details on how chemicals are assessed under TSCA can be found at: <https://www.epa.gov/reviewing-new-chemicals-under-toxic-substances-control-act-tsca/regulatory-determinations-made>.

There is significant overlap between the ingredients used for inert/other chemicals used in registered pesticide products and spray adjuvant products. One state lead agency reported that during the process of registering spray adjuvant products they cross-check each product's ingredients against EPA's Inerts Finder tool. (Available at <https://ordspub.epa.gov/ords/pesticides/f?p=INERTFINDER:1:0::NO:1::>, the Inert Finder is EPA's clearinghouse for all inert/other ingredients used in registered pesticide products.) That state above does not allow registration of spray adjuvant products that include chemicals missing from the Inert Finder lists. EPA's Inert Finder can be sorted by food and non-food uses.

Appendix B contains the response provided by the Office of Pesticide Programs (OPP) at EPA to questions about adjuvants and required risk assessments. In the response, EPA indicates that during pesticide registration OPP includes all chemicals in the final product formulation and all chemicals mentioned on the product label into the registration risk assessment.

At present, the scope of the Board of Pesticides Control's regulatory authority is the distribution and use of pesticides.

## **B. Results from Survey of Other States**

To better understand spray adjuvant regulation, BPC staff researched the regulatory authorities and processes in other states. States were contacted by direct email and asked a series of questions; additionally, states were queried with a survey distributed via the Association of American Pesticide Control Officials (AAPCO).

Several states responded and provided the following information. Arkansas provided an Excel spreadsheet of all adjuvants currently registered in the state of Arkansas. California was unable to provide any information due to a lack of resources to check the confidential statements of formula for all the adjuvant products to determine if the state had any adjuvants with PFAS, and additionally because the department is unsure if they would be able to provide this confidential business information. Idaho noted that their

new database program requires actives/principle functioning agents to be listed when registering products; however, this is confidential information. They also stated that they would reach out again once they have devised a list of adjuvants registered in Idaho. Utah provided a way for BPC staff to find a list of registered adjuvants in the state of Utah on their state website. Appendix C contains the complete lists of spray adjuvant products registered in Arkansas, Tennessee, and Washington (these are the only states providing lists by the survey deadline).

Washington provided resources to determine a list of adjuvants registered in the state that have been added to the Washington State University website, Pesticide Information Center OnLine (PICOL). This is the official repository of pesticide labels registered in both Washington and Oregon. The list is not currently updated with a full list, but the internal database for Washington indicates there are about 870 adjuvants registered. Full text of how to navigate Washington’s adjuvant registration page is provided as an excerpt of an email in Appendix D.

Requirements of each state’s program is available in Table 1. These details include requirements and details for spray adjuvant registration including: registration fee per product, registration period, copy of product label, copy of confidential statement of formula, and a safety data sheet.

**Table 1.** Requirements from the nine states that regulate spray adjuvants as pesticides.  
 Note: States that require EPA confidential statement of formula (EPA Form #8570-4) for all pesticides (not spray adjuvants) are as follows: California, Colorado, Florida, Hawaii, and New York.

State	Application for Registered Pesticides	Registration Fee per product (\$)	Registration Period (years)	Copy of Product Label	Copy of Spray Adjuvant Confidential Statement Formula (CSF)	Safety Data Sheet (SDS)
Arkansas	Yes	250	1	Required only upon request	Required only upon request	Required only upon request
California	Yes	1,150 for initial registration and annual renewal fee	1	6 copies, and copy of EPA approved label and letter unless product is exempt		
Idaho	Yes	160	1	Yes	Yes, along with efficacy data	Yes
Kentucky	Yes	250	1			

Mississippi	Yes	200	1	Yes (active ingredients & percentage)		
Tennessee	Yes	200	1			
Utah	Yes	195	1	Yes		
Washington	Yes	650	2	Yes	Yes	Yes
Wyoming	Yes		1			

### C. Methods for Identifying Specific Pesticide and Spray Adjuvant Ingredients as PFAS

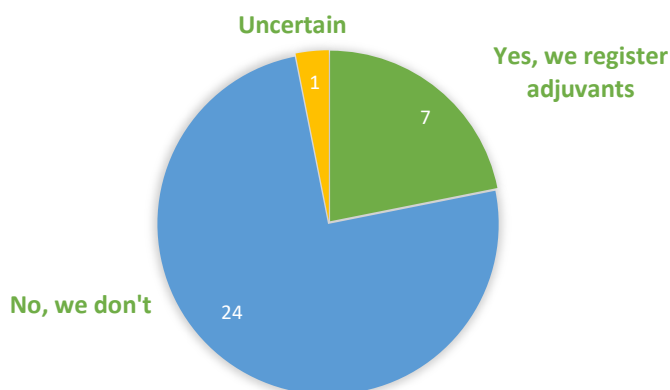
BPC has not identified any specific spray adjuvants as containing PFAS for several reasons. First, what chemicals fit the state’s definition of PFAS have yet to be finalized by the Department of Environmental Protection (DEP), and secondly, BPC is waiting for the release of a software add-on on EPA’s CompTox Dashboard that will allow us to easily compare the compounds listed as adjuvant ingredients to the chemical structure established by DEP. Once there is additional guidance from DEP and a webpage update from EPA, BPC will be able to use qualifying chemical structures established by DEP as search criteria in the CompTox Dashboard and cross reference those chemicals to the potential ingredients in spray adjuvants identified by searching the relevant state and federal adjuvant databases. EPA estimates the CompTox Dashboard add-on to be available to the public starting around December 2021-January 2022.

BPC has initiated the restructuring of the MEPRLS database to collect confidential statement of formula forms (CSF) for pesticides to be registered in the 2022 registration year. Should spray adjuvants become regulated by BPC, adding the functionality for collecting CSF information for spray adjuvants would not be a significant obstacle.

### D. State Regulatory Agency Adjuvant Survey Results

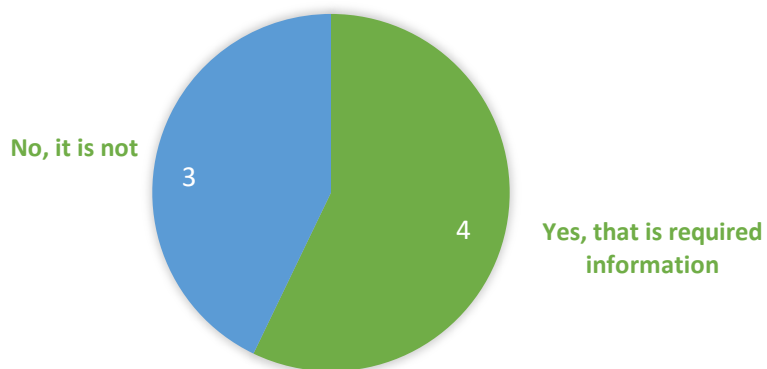
Through the American Association of Pesticide Control Officials (AAPCO), a national organization representing state lead agencies responsible for pesticide regulation, BPC asked other states a series of questions about spray adjuvant registration. The survey yielded results from 32 states. Most of the responses indicated that spray adjuvants are not included in pesticide programs’ responsibilities - see pie chart below.

### Survey Responses Asking State Pesticide Programs: Does Your State Regulate Adjuvants?



Survey responses provided contact information from the state lead agencies that regulate adjuvants and, in some cases, lists of registered spray adjuvant products were also provided. For the states registering spray adjuvants, most do not perform risk assessments on the products. Several states indicated that they review the labeling of the product. The labeling review simply matches the product to the types of claims that can be made for that type of product and ensures no misleading statements are present.

### Survey Results From States That Regulate Adjuvants Asking: Is Ingredient Information Required?



The survey additionally asked states if ingredient information was collected. There are two aspects to this: states can collect 1) only “active ingredient” information and require it to be present on the label or 2) all product constituents CSF. To avoid confusion during registration, some states use differing terminology to differentiate between pesticides and spray adjuvants. Some spray

adjuvant registrations use the term “primary functioning agents (PFA)” instead of “active ingredient.” The PFAs are required to appear on labels in some states, similar to how active ingredients are required on pesticide labels. In some states, ingredients are reviewed for accuracy, and the ingredients are compared to EPA’s Inert List. All compounds on EPA’s Inert List have been assessed for risk enabling manufacturers to include the compounds in pesticide product formulations. The Inert List is publicly available, but the specific inert ingredients found in a pesticide product are not. Two of the four states appear to collect the CSF. None of the states indicated that they prohibit certain adjuvants.

The purpose of the survey was to gather from states as much information on regulating spray adjuvants as possible. While much of the information ended up being redundant with the information gathered by directly emailing state lead agencies, confirming that most states do not register spray adjuvants was helpful.

## V. What is Needed to Regulate Fluorinated Spray Adjuvants?

### A. Authority

To determine what is needed to regulate spray adjuvants, the BPC researched authorities necessary for adding spray adjuvants to regulated products. This required an investigation into if other states regulate spray adjuvants and if those states require adjuvants to be registered as pesticides. The following nine states regulate spray adjuvants as pesticides: Arkansas, California, Idaho, Kentucky, Mississippi, Tennessee, Utah, Washington, and Wyoming. To determine how these states regulate spray adjuvants as pesticides, the BPC looked at each state’s statutory definitions (Table 2).

**Table 2.** State statutory definitions relating to pesticides and spray adjuvants.

State	Statute	Definition
Arkansas	2012 Arkansas Code Title 2 -Agriculture Subtitle 2 – Agronomy Chapter 16 – Plant Disease and Pest Control Subchapter 4 – --Pesticide Control 2-16-403 – Definitions	"Spray adjuvant" means any wetting agent, spreading agent, sticker, deposit builder, adhesive, emulsifying agent, deflocculating agent, water modifier, or similar agent intended to be used with any other pesticide as an aid to the application or to the effect thereof, and which is in a package or container separate from that of the pesticide with which it is to be used

	<a href="#">AR Code § 2-16-403 (2012)</a>	<p>"Active ingredient" means any ingredient which will prevent, destroy, repel, control, or mitigate pests or which will act as a plant regulator, defoliant, desiccant, or spray adjuvant</p> <p>"Pesticide" means any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pests; any substance or mixture of substances intended for use as a plant regulator, defoliant, or desiccant; and any substance or mixture of substances intended to be used as a spray adjuvant.</p>
<b>Kentucky</b>	<p>KRS 217.544(26)</p> <p>KRS 217.544(31)</p>	<p>"Pesticide" means any substance or mixture of substances intended to prevent, destroy, control, repel, attract, or mitigate any pest; any substance or mixture of substances intended to be used as a plant regulator, defoliant, or desiccant; and any substance or mixture of substances intended to be used as a spray adjuvant.</p> <p>"Spray Adjuvant" means any wetting agent, spreading agent, sticker, deposit builder, adhesive, emulsifying agent, deflocculating agent, water modifier, or similar agent intended to be used with any other pesticide as an aid to the application or to the effect thereof, and which is in a package or container separate from that of the other pesticide with which it is to be used.</p>
<b>Wyoming</b>	<a href="#">WY Stat § 35-7-354 (2018)</a>	<p>"Pesticide" means any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pests; any substance or mixture of substances intended for use as a plant regulator, defoliant, or desiccant; and any substance or mixture of substances intended to be used as a spray adjuvant.</p>
<b>Maine</b>	<p>Title 22. Health and Welfare  Subtitle 2: Health  Part 3: Public Health  Chapter 258-A: Board of Pesticides Control  1471-C. Definitions</p>	<p>"Pesticide" means any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, and any substance or mixture of substances intended for use as a plant regulator, defoliant or desiccant.</p> <p>"Pesticide dealer" means any person who distributes limited or restricted use pesticides.</p>

## B. Budget Considerations

In a third query, BPC staff sent an email to states that regulate adjuvants to inquire about the staffing demands of spray adjuvant registrations. There is considerable variation in staffing between the states that handle spray adjuvant registrations. These differences parallel the thoroughness of review the spray adjuvants are given. For example, in Washington, each ingredient is verified against EPA's list of reviewed inert ingredients. The spray adjuvant

program demands greater resources as compared to those states that simply collect registration fees and no other documentation. The state responses are summarized in Table 3.

**Table 3.** State programmatic costs for spray adjuvant registration administration from state programs registering spray adjuvants.

State	Program Cost Description Email Responses
Arkansas	...The Arkansas Department of Agriculture, Pesticide Section has 2 employees that handle registration reviews for Adjuvants. 1 Program Manager and 1 Program Coordinator.
Kentucky	...We have one staff member that works as our Product Registration Coordinator. Her supervisor is available for questions that may arise on label reviews and there are 3 of us that are involved in 24(c) and Section 18 requests.
Mississippi	...Currently, I [Branch Director, Bureau of Plant Industry] am the only person who reviews adjuvants in Mississippi. I have an assistant who helps with registrations, but she does not review adjuvants.
Utah	...We have one FTE in pesticide registration, which handles all that you mentioned in your email to me [adjuvant registration, regulation, review process, etc.]. Her job classification is Program Specialist. We don't review EPA registered products. Adjuvants and 25(b)'s get a review looking for key words/terms that I have given her. If she sees them, then I review the label. She also makes sure that 25(b)'s meet the EPA Label Review Manual's requirements.
Washington	<p>...Entire registration staff currently consists of 7 people            2 pre-registration/helpdesk,            4 registration specialists            1 registration supervisor that also performs registrations</p> <p>Review/Registration Process:            We currently have 15,500 pesticides registered, and of these 895 (5.8%) are spray adjuvants. Washington state regulates spray adjuvants as pesticides. (This same staff also maintains and registers fertilizers—we have about 10,000 registered currently.)            Spray adjuvants are our most difficult and most time-consuming registration type. There is no federal oversight, so all the review is done within our program. We also require the complete formula to be submitted, which can be challenging if a registrant is using a 100% repack of someone else's "proprietary" formula. We also have difficulties getting an acceptable label that meets WA state laws and rules.            You probably also know that there are only a few states that register spray adjuvants—and that WA and CA do the most intensive review. California review is data focused, and Washington state review is label focused.</p> <p>We do not allow any adjuvant to be used aquatically unless data is submitted. In this case, everything gets sent to our agency toxicologist for his review and approval. I have heard that most spray adjuvant registrants will get their product approved in WA and CA, and then will submit them to other states. The other states (knowing that they passed the test in WA and CA) will register without much review.</p>

	<p>Estimates of FTEs:          .10 FTE for Pre-registration/help desk: time spent making sure application is complete (confidential statement of formula, safety data sheet.) Staff are Customer Service Specialists          FTE for Registration: application review, proper labelling, verifying ingredients, chasing down the complete formula, corresponding with registrants, component suppliers, manufacturers. Staff are Senior Registration Specialists          .05 FTE for Tox review. Staff is a Senior Toxicologist</p> <p>Total is about 1.15 FTE for us. I think it gives you a good flavor that spray adjuvants at 3.5% of our total (pesticide and fertilizer) registrations requires over 16% of our staff resources.</p>
Wyoming	Department only has one person designated to product registration.

In sum, as modeled by states, spray adjuvants may be regulated by: 1) creation of a statutory and regulatory rubric that allows for adjuvants to be regulated by the controlling pesticide agency, including key definitions and collection of fees equivalent to pesticide registrations; 2) collecting spray adjuvant information in a manner similar to the pesticide registration process; and 3) requirement (by some states) of copies of confidential statements of formula. The degree to which states review pesticide product registration and adjuvant registration applications is directly dependent upon the availability of dedicated staff. Maine has dedicated 0.75 FTE to pesticide product registration, and the BPC is currently in the process of hiring an additional full-time FTE to better address existing registration and water quality monitoring responsibilities. Any additional staff time required for adjuvant registration application review will be additive to existing responsibilities and it should be noted that some states dedicate staffing for this purpose.

Should Maine require registration for the approximately 870 spray adjuvants registered in Washington State, implementation would likely require at least one FTE to process new applications. The increased staff demand depends on the extent of the review required. Registration of adjuvants will add to the inspection workload, referrals to the registration specialist, and follow up with companies.

If adjuvants will be registered and defined as pesticides, then registration will be subject to registration requirements for pesticides such as label review unless the statute specifically exempts spray adjuvants from label review. Review will require time and likely follow up with companies regarding label and CSF deficiencies.

## VI. A Feasible Definition of PFAS Adulteration

For BPC to enforce regulations specific to PFAS adulteration, there first needs to be an established definition of PFAS. Further, established and efficacious methods must also be available to detect the presence of PFAS for enforcement purposes.



## A. Variety of Possible PFAS Definitions

BPC staff explored a variety of different PFAS definitions. Appendix E contains a list of alternative definitions for PFAS categorization that were discovered in this process. However, the BPC public policy board has moved to adopt the PFAS definition established with LD 1503 (<http://www.mainelegislature.org/legis/bills/getPDF.asp?paper=HP1113&item=5&snum=130>), hereafter referred to as the “State’s definition.” The State defines PFAS as “one fully fluorinated carbon”; this definition is similar to several PFAS definitions from relevant authoritative bodies (e.g., EPA’s Office of Pollution Prevention and Toxics and Organization for Economic Co-organization and Development (OECD)), but it is not precisely the same. The state’s definition includes a greater variety of compounds than the definition used by BPC’s federal counterpart.

LD 1503 requires manufacturers of products with intentionally added PFAS to report the presence of those substances in those products to DEP beginning in 2023, and those products may not be sold after 2030, with limited exceptions. Adopting the definition established in LD 1503 will aid harmonization of State rules. In addition to being subject to LD 264, pesticide products are also subject to the reporting requirements of LD 1503. Given the broad reach of LD 1503, compliance will be aided by using a singular definition. To further assist compliance, BPC is communicating with pesticide registrants regarding their obligations under LD 1503.

### *i. Enforcement Limitations*

Currently, there is not a suite of methods available that enables testing for all PFAS in pesticide products. The delegated enforcement authority granted by the cooperative agreement with EPA demands properly executed and repeatable sample testing methodologies. In the fall of 2021, EPA released approved test methodology suitable for PFAS in oily-based pesticide products. This new method, an adaptation of EPA method 537.1, identifies 28 unique PFAS and is available at:

<https://www.epa.gov/system/files/documents/2021-09/epa-pfas-method-in-oil.pdf>.

Hence, while BPC can collect affidavits regarding PFAS during the registration process, there currently exists only limited testing capabilities to detect the presence of the compounds in actual pesticide products.

There are somewhere between three to 190 constituents currently in pesticide products and adjuvants that may become classified as PFAS under the new definition referenced in LD 1503. Their presence is currently legal, but should they be become State prohibited, enforcing against them may prove to be difficult. One approach to establishing their presence could be following up on CSF records submitted to the BPC. The other approach, analytical testing, is more difficult for several reasons. Current analytical capabilities could only identify 28 of the 12,039 PFAS known to exist. Furthermore, even if it was possible to analytically identify all known PFAS, enforcement would be prevented due to a lack of regulatory allowable limits for each of the compounds. Given the background concentrations of PFAS found in many media, allowable thresholds need to be set before adulteration could be defined for enforcement purposes.

## *ii. Regulating PFAS As a Class*

One approach to accommodate the uncertainty associated with this large class of chemicals has been to treat all PFAS as one class. While this is a simpler and seemingly easier approach, it is not consistent with current chemical regulations which are based on risk. Lumping PFAS into a single group ignores that they are likely to have differing effects in the body as well as differing movement through the environment. In Vermont, this approach was assessed but not endorsed because of the lack of toxicological data and lack of test methods for all the potentially regulated compounds, among other factors (<https://dec.vermont.gov/sites/dec/files/PFAS/20180814-PFAS-as-a-Class.pdf>).

Pesticide active ingredients are described in published literature at a level of detail not seen for thousands of PFAS chemicals, and many of the concerns surrounding PFAS are addressed as part of the pesticide registration review process. For pesticide registrations, there is publicly available information that describes toxicity and environmental fate in a way not seen for most PFAS. For example, a concern with PFAS is persistence in the environment--the amount of time it takes a pesticide to break down in the environment is required information for every pesticide registration. Of the federal laws that regulate chemicals, the Federal Insecticide Fungicide and Rodenticide Act (FIFRA) that regulates pesticides is more restrictive and transparent than the Toxic Substances Control Act (TSCA) that regulates general and industrial chemicals, like PFAS.

## *iii. Federal Approach to Adulteration in Pesticides*

Currently, pesticide registrants are required (under FIFRA Section 6(a)(2)) to submit information to EPA when they discover or are made aware of PFAS in their products. This requirement under FIFRA stipulates manufacturers and registrants must report to EPA any known adulteration issues. PFAS are classified as adulterants because EPA has indicated ‘any level of PFAS to be potentially toxicologically significant’ in pesticide products. Therefore, when pesticides contain any amount of PFAS, reporting due to product adulteration is triggered under 40 CFR 159.179(b)(2). Adulteration by contaminants and impurities under FIFRA is set with the following criteria from 40 CFR 159.179(b):

- (1) Quantities greater than 0.1 percent by weight (1,000 parts per million).
- (2) Quantities that EPA considers, and so informs registrants, to be of toxicological significance.
- (3) Quantities that the registrant considers to be of toxicological significance.
- (4) Quantities above a level for which the registrant has information indicating that the presence of the contaminant or impurity may pose a risk to health or the environment.
- (5) Quantities that a person described in § 159.158(a) has informed the registrant is likely to be of toxicological significance.

## VII. What Is Necessary to Prohibit Distribution and Application of Pesticides & Adjuvants Containing PFAS?

### A. Current state and federal laws

#### *i. Pesticides*

Current Maine law allows the BPC to collect CSF information for pesticide products as part of the annual registration process. Assessing each product against a list of prohibited PFAS could occur once the MEPERLS development work is completed. The newly enacted affidavits, in combination with the new CSF submission requirements, provide a mechanism to identify all pesticide products with intentionally added PFAS.

#### *ii. Spray adjuvants*

Currently, Maine does not regulate spray adjuvants. Authority to the state to regulate spray adjuvants would need to be established by the Legislature. A mechanism used in other states is to re-define pesticides in a manner that specifically brings in spray adjuvants. A clear statement of prohibition of PFAS chemicals in spray adjuvant products would further be required to create a prohibition of PFAS intentionally added to spray adjuvant products.

#### *iii. Containers*

Current state and federal law allows the use of HDPE containers that have been fluorinated in many applications, including for pesticide and spray adjuvant packaging. EPA has asked pesticide companies to voluntarily stop this practice and to seek alternative packaging. Certain products have been pulled from shelves and none of the products associated with PFAS adulteration from containerization are available on the market. The newly enacted affidavits identify pesticide products contained in fluorinated HDPE containers. A clear statement prohibiting the use of fluorinated HDPE containers at any stage of pesticide product storage would be required to prohibit the use of these containers.

### B. Related State Laws

LD 1503 will prohibit PFAS chemicals as intentionally added components in pesticides starting in 2030. However, DEP may allow for a product with intentionally added PFAS to be sold if such product's use of PFAS is designated as "unavoidable" by DEP.

For registered pesticides, the prohibition of distribution of items containing intentionally added PFAS, as detailed in LD 1503, would also effectively ban use of the same in Maine unless DEP were to find their use "unavoidable." If sale is prohibited, however, pesticide

registration could not occur, and under Maine State law, all pesticides must be registered in order to be lawfully used.

## Helpful Resources:

### Spray Adjuvants-

Winand Hock, PH.D., Pennsylvania State University <https://extension.psu.edu/spray-adjuvants>

### PFAS Definitions-

Office of Pesticides Programs page on PFAS in pesticide packaging:

<https://www.epa.gov/pesticides/pfas-packaging>

OECD recent publication: <https://www.oecd.org/chemicalsafety/portal-perfluorinated-chemicals/terminology-per-and-polyfluoroalkyl-substances.pdf>

### PFAS General-

OECD Portal on Per- and Poly-fluorinated Chemicals

<https://www.oecd.org/chemicalsafety/portal-perfluorinated-chemicals/>

Advance Notice On The Regulation Of Perfluoroalkyl, Polyfluoroalkyl Substances (Pfas) As A Class. Vermont Agency Of Natural Resources Department Of Environmental Conservation Drinking Water And Groundwater Protection Division. August 14, 2020. 11pp. <https://dec.vermont.gov/sites/dec/files/PFAS/20180814-PFAS-as-a-Class.pdf>

### Bulk Pesticide Distribution-

EPA: A two-page brochure on refilling issues with the container and containment rule is available at: <https://www.epa.gov/sites/default/files/2015-05/documents/ccrule-brochure.pdf>

APPROVED	CHAPTER
JUNE 21, 2021	83
BY GOVERNOR	RESOLVES

STATE OF MAINE

IN THE YEAR OF OUR LORD  
TWO THOUSAND TWENTY-ONE

H.P. 185 - L.D. 264

**Resolve, Directing the Board of Pesticides Control To Gather Information  
Relating to Perfluoroalkyl and Polyfluoroalkyl Substances in the State**

**Sec. 1. Board of Pesticides Control to amend rules relating to registered pesticides. Resolved:** That the Department of Agriculture, Conservation and Forestry, Board of Pesticides Control shall amend its rules governing the registration of pesticides in the State to require manufacturers and distributors to provide affidavits stating whether the registered pesticide has ever been stored, distributed or packaged in a fluorinated high-density polyethylene container and to require manufacturers to provide an affidavit stating whether a perfluoroalkyl or polyfluoroalkyl substance is in the formulation of the registered pesticide.

**Sec. 2. Board of Pesticides Control to gather information relating to perfluoroalkyl and polyfluoroalkyl substances. Resolved:** The Department of Agriculture, Conservation and Forestry, Board of Pesticides Control shall conduct a study to determine if fluorinated adjuvants are being used or sold in the State. The board shall explore what is needed to regulate fluorinated adjuvants in the State and shall explore what is necessary to impose a prohibition on the distribution or application of pesticides or adjuvants containing perfluoroalkyl or polyfluoroalkyl substances in the State. The board shall develop a feasible definition of perfluoroalkyl or polyfluoroalkyl adulteration in a pesticide. The board shall submit a report based on the study with findings and recommendations to the Joint Standing Committee on Agriculture, Conservation and Forestry no later than January 15, 2022. The joint standing committee may submit a bill to the 130th Legislature relating to the subject matter of the report.

## Appendix B EPA Email Response Clarifying Risk Assessments For Adjuvants and Spray Adjuvants

### Email Response from EPA:

#### **Spray adjuvants are not pesticides and not covered under FIFRA, right? Tolerances are set for those spray adjuvants to be used on ag commodities but that comes from FFDCa and FQPA, right?**

When evaluating a pesticide product for registration under FIFRA, EPA considers the proposed directions for use as well as widespread and commonly recognized practice of how it is used. That consideration may include how an adjuvant affects the use of the pesticide. Although adjuvants are not registered as pesticides, they are still regulated because adjuvants are chemicals added to a pesticide by users to improve the pesticide's efficacy. Such agents are often included in pesticide formulations as "other ingredients," in which case the ingredient is reviewed during registration and any necessary tolerances or exemptions from the requirement of a tolerance are established. Where a product label directs the user to add a particular adjuvant before use, the registering division will treat that adjuvant as if it were an "other ingredient" in making the registration decision, and will assure that any necessary tolerances or exemptions from the requirement of a tolerance are established. It also would be within the Agency's authority to treat any tank-mixed substance as part of the pesticide (and thus needing an FFDCa tolerance) in that it met the FIFRA definition of pesticide – i.e., a "mixture" of substances intended to kill a pest. See [Chapter 1](#) of the Pesticide Registration Manual.

#### **I feel like inert/other ingredients are covered under FIFRA but registration is not required, is that true? and if so, is the same true for spray adjuvants? How can I find the requirements for tolerance setting on spray adjuvants and inert/other ingredients?**

EPA registers pesticide products, i.e., a product that includes a pesticidal active ingredient and any inert or other ingredients that make up the whole formulation. The registration of pesticide products under FIFRA include a determination that the pesticide product formulation meets the registration standard under FIFRA section 3 (including the lack of unreasonable adverse effects on the environment). The entire formulation, including the inert ingredients, must meet this standard. Inert ingredients themselves are not registered under FIFRA; the same applies to adjuvants. In addition, the Federal Food, Drug, and Cosmetic Act (FFDCa) requires that pesticide chemical residues, including any active ingredient and inert ingredients in pesticide products, used on food and feed crops, agricultural commodities, or livestock must have a tolerance or tolerance exemption under 40 CFR Part 180. See Chapter 8 of the Pesticide Registration Manual. Approved inert ingredient tolerances and tolerance exemptions are found in the Code of Federal Regulations (CFR) under 40 CFR Part 180. Links to inert ingredients approved for nonfood uses are listed on the Inert Ingredients Web page.

If the use of an adjuvant may result in detectable residues on food, the applicant should contact the EPA product manager or registration ombudsman (Chapter 21) prior to submitting the application to discuss the potential need for a tolerance. See Chapter 11 of the Pesticide Registration Manual; and Code of Federal Regulation, Title 21 Part 178 –Indirect Food Additives: Adjuvants, Production Aids, and Sanitizers

**Continued... Email Response from EPA:**

**For spray adjuvants not intended for ag commodities what authorization are they regulated under?**

If an adjuvant is listed on the product formulation, it would be evaluated by EPA as part of the overall formulation. If it is not listed as part of the product formulation, and there is no expectation of residues in or on food as a result of the use of the pesticide (e.g., because it is not intended to be used on food crops), then EPA would not regulate its use. Generally, it is likely that the adjuvant would be identified on the label, and so there might be some consideration of the adjuvant as part of the reviewing the label. This [guidance](#) on inert ingredient for non-food use may be helpful insight for an example of a process that could apply to an adjuvant. [Inert ingredients guidance for new nonfood use \(pdf\)](#)



## Appendix C List of Registered Adjuvant Products in Other States (Arkansas, Tennessee, & Washington)

### Arkansas

3M 6000 Copper Granules	Poolstyle Pool Products 3" Triple Action Tabs	Super Algi-Gon	HTH Pool Care Algae Guard 30
3M 7000 Series Copper Granules	Poolstyle Pool Products Bright Shock	Clearigate EC9	HTH Pool Care Algae Guard Granules
Water Bath Additive	Pool Season Brominating Tablets	Swintrine 90	HTH Pool Care Algae Guard Ultra
c-series Water Bath Additive	Re-Fresh	Applied Biochemist Power Blast 70	Poolife Exclusive Pool Care Collection Complete Control Shock and Algaecide
Ultima Total Control Shock and Algaecide	Re-Fresh Dry Chlorinating Granular	Applied Biochemist Power Blast II	90 Years of HTH Perfect Pools
Ultima Nix	Super Shock-It 73	Cutrine Plus Algaecide	Ultimate 3" Chlorinating Tablets
Ultima Platinum Plus	Regal Pool Care System Algaecide 60	Silvertrine	90 Years of HTH Perfect Pools
Aqua Silk Algaecide	Regal Pool Care System Poly-Algaecide 30	Applied Biochemists 3" Tablets	Ultimate Algae Guard
Ultima TKO	Regal Pool Care System Algaecide 50	Applied Biochemists Chlorinating Capsules	90 Years of HTH Perfect Pools
Ultima Swamp to Swim I	Regal Pool Care System Granular 90	Applied Biochemists Triple Action Tablets	Algae Guard 30
Ultima Yello-Free Algaecide	Pool Season Algae Control 60	Phycomycin-SCP Algaecide & Oxidizer	90 Years of HTH Perfect Pools 1" Chlorinating Tablets
Salt Solutions by Ultima Algaecide	E-Z Clor Algaecide	Stocktrine II Algaecide	Constant Chlor Plus Marathon Tablets
Aqua Silk Alage Control	Pool Season Algae Control 30	Swimtrine Plus	90 Years of HTH Perfect Pools
Ultima Swamp To Swim (Kit)	Pool Season Super Algae Destroyer	Algi-Cure Algaecide	Liquid Chlorinator
AEM 5772 Antimicrobial	Pool Logic Think Clear Brominating Tablets	YELLOWTRINE	Chlorine-Free BaquaSpa Start-Up Kit
Bug Out Sticks	Pool Season Concentrated Algae Kill II	Clearigate	Poolife Exclusive Pool Care Collection NST Patrol
Stabrom 909 Biocide	Alligare 8% Copper	Aquamira Water Treatment	Poolife Exclusive Pool Care Collection NST Purge
Clarifect	Argos	Aquashade Aquatic Plant Growth Control	Poolife Exclusive Pool Care Collective NST Prime
Clor Mor Calcium Hypochlorite 3 Inch Tablets	AB Brand Copper Sulfate Crystals	Baquacil Algicide	90 Years of HTH Perfect Pools Floater
Clor Mor Cal-Shock Cal Hypo Granules	Algimycin-PWF	Baquacil Performance Algicide	90 Years of HTH Perfect Pools Shock! Treatment
E-Z Clor Quick Dissolve	Algaecide/Cyanobactericide	Chlorine-Free Care Free Baquacil	90 Years of HTH Perfect Pools 3 Inch Chlorinating Tablets
E-Z Clor Mustard Algae Plus	Black Algaetrine	AD Auto Dosing System	90 Years of HTH Perfect Pools Pre-measured Water Soluble Pods Algae Guard
Super Shockwave Shock Treatment	Cutrine Ultra	Chlorine-free Care Free Baquacil	90 Years of HTH Perfect Pools Water Soluble Pods Shock!
Re-Fresh+	CutrinePlus Algaecide/Herbicide	AD Automated Dosing System	
E-Z Clor Algaecide Plus	CutrinePlus Granular Algaecide	Com Chlor 3" Stabilized	
Pool Logic Think Clear Solution 60	Algaetrine	Chlorinating Tablets	
Regal Pool Care System Brom-A-Gard	Pooltrine 60	Constant Chlor Plus Calcium Hypochlorite Briquettes	
Regal Pool Care System Algaezone Plus	Swimtrine 7.4	HTH Pool Care Liquid Chlorine	
	Wintertrine	HTH Pool Care Algae Guard Advanced	
	Applied Biochemists Phycomycin	HTH Pool Care Algae Guard 10	
	SCP Algaecide/Cyanobactericide	HTH 3" Chlor Tabs	

90 Years of HTH Perfect Pools  
 Ultimate Shock! Treatment  
 90 Years of HTH Perfect Pools Pool  
 Care Kit for Opening/Closing  
 90 Years of HTH Perfect Pools  
 Super Green to Blue Shock System  
 90 Years of HTH Perfect Pools  
 Algae Guard Granules  
 90 Years of HTH Perfect Pools  
 Super Algae Guard  
 90 Years of HTH Perfect Pools  
 Super 3" Chlorinating Tablets  
 90 Years of HTH Perfect Pools  
 Super Green to Blue I  
 90 Years of HTH Perfect Pools  
 Super Shock! Treatment  
 90 Years of HTH Perfect Pools  
 Ultimate Mineral Brilliance  
 Chlorinating Granules  
 HTH Salt Pool Care Algaecide  
 Pool Breeze Pool Care System  
 Defender  
 Pool Breeze Pool Care System Extra  
 Pool Breeze Pool Care System  
 Opticide  
 90 Years of HTH Perfect Pools  
 Algae Guard 10  
 90 Years of HTH Perfect Pools  
 Chlorine Granules  
 HTH Super Green to Blue I  
 HTH Super Shock Treatment  
 HTH Ultimate Shock Treatment  
 HTH Ultimate Algae Guard  
 Pace Premier Shock Treatment  
 Poolife Exclusive Pool Care  
 Collection Algaecide 90  
 HTH Pool Care Kit  
 HTH Algae Guard 10  
 HTH Algae Guard 30  
 HTH Shock Treatment  
 HTH Super 60 Shock Treatment  
 HTH Super Algae Guard 60

Pool Breeze Pool Care System Algae  
 Clear  
 Pace 3" Chlor-Tabs  
 HTH Algae Guard Granules  
 Baquacil Select Algicide  
 Reputain D20 Preservative  
 Pond Oasis Algaecide  
 Poolife Exclusive Pool Care  
 Collection Back to Blue I  
 Pool Breeze Pool Care System  
 Yellow Eliminate  
 HTH Super Algae Free  
 Densil ZOD Antimicrobial  
 Dry Tec Extra Shock  
 HTH Green to Blue Super Shock I  
 Poolife Exclusive Pool Care  
 Collection Defend +  
 HTH Pool Shock  
 Reputain D20 Antimicrobial  
 HTH Clear Shock  
 HTH Super Shock Treatment  
 Reputain B30 Preservative  
 Poolife Exclusive Pool Care  
 Collection AlgaePhos Algaecide  
 Baquacil Algidefense  
 Open/Close Algistat  
 HTH Super 3" Chlorinating Tablets  
 Outlast Mold-Buster Additive  
 Poolife Exclusive Pool Care  
 Collection Brite Stix  
 Pool Breeze Pool Care System Start-  
 up & Winterizing Algicide  
 HTH Algaeguard 3x Concentrate  
 Poolife Exclusive Pool Care  
 Collection AlgaeBan II  
 Poolife Exclusive Pool Care  
 Collection Mustard Algae Treatment  
 Pool Breeze Pool Care System Super  
 AlgiKill  
 Poolife Exclusive Pool Care  
 Collection AlgaeKill II

Poolife Exclusive Pool Care  
 Collection Instant Clear Cleaning  
 Granules  
 Poolife Exclusive Poolife Rapid  
 Shock Shock Treatment  
 Poolife Exclusive Pool Care  
 Collection Super AlgaeBomb 60  
 Algaecide  
 Poolife Exclusive Pool Care  
 Collection Turboshock Shock  
 Treatment  
 Poolife Exclusive Pool Care  
 Collection Super Shock 'N Swim  
 Shock Treatment  
 Pulsar Plus Calcium Hypochlorite  
 Briquettes for Commercial Swim  
 Pool Use  
 Reputain K50 Preservative  
 HTH Spa Shock  
 HTH Super Algae Guard  
 Poolife Exclusive Pool Care  
 Collection Active Cleaning Granules  
 Chlorinator  
 Poolife Exclusive Pool Care  
 Collection AlgaeBomb 30 Algaecide  
 Poolife Exclusive Pool Care  
 Collection Cleaning Sticks Stabilized  
 Chlorinator  
 Poolbreeze Pool Care System  
 Algicide 60  
 Proxel BD 20 Industrial Microbiostat  
 Proxel GXL Industrial Microbiostat  
 Pulsar Power Shock  
 Pool Breeze Pool Care System  
 Granular Shock Treatment  
 Proxel AQ Preservative  
 Pool Breeze PCS 3" Chlorinating  
 Tablets  
 Pool Breeze PCS Algicide  
 Pool Breeze PCS Chlorinating  
 Granules  
 Pool Breeze PCS Chlorinating Sticks  
 Pool Breeze PCS Granular 68

Pool Breeze PCS Shock Treatment  
 & Superchlorinator  
 DryTec Calcium Hypochlorite  
 Briquettes  
 Dry Tec Calcium Hypochlorite  
 Granular  
 HTH Liquid Chlorinator  
 HTH Shock 'N Swim  
 HTH Spa Brominating Tablets  
 HTH Spa Non-Foaming Algaecide  
 Omni Algae Terminator  
 Omni Multi-Purpose Algaecide 60  
 Synergy Tabs  
 Omni Algae Preventative 40  
 Winter Care Winter Algaecide 40  
 Omni Breakout 60  
 Myacide AS Plus  
 Myacide AS Technical  
 Myacide GA 50  
 Myacide GA 25  
 MasterLife AMA 100  
 Admiral WSP  
 Admiral Liquid  
 Green-Shield II Disinfectant &  
 Algicide  
 Bellacide 350  
 Bellacide 355  
 Bellacide 325  
 Bellacide 301  
 Bellacide 300  
 Bellacide 355W  
 Bellacide 364  
 Bellacide 337  
 LiquiBrom 4300  
 LiquiBrom 4000  
 LiquiBrom 4600  
 Bellacide 300W  
 Bellacide 150  
 Bellacide 311  
 Magnacide B Microbiocide  
 X-Cide 102  
 X-Cide 137  
 X-Cide 302

X-Cide 105 Industrial Bactericide	GreenClean Granular Algaecide	ChemTreat CL 2250	Boost 3000
X-Cide 120 Industrial Bactericide	GreenClean FX Liquid Algaecide	ChemTreat CL497	Oxxium 203
Bayer Advanced 2-in-1 Moss & Algae Killer Ready-To-Spray	GreenClean Pro	ChemTreat CL-2206	Surpass 100
Algaecure Algaecide for Ponds and Fountains	ZeroTol 2.0	ChemTreat CL-25	Tsunami 100
Algaecure	SaniDate 12.0	ChemTreat CL2155	WCS 102
Pro Guard 60% Algicide	GreenClean Liquid 5.0	ChemTreat C-2183T	Algaway 60
Pro Guard Algae Predator	ZeroTol HC	Chemtreat CL-4907	Microbe-lift Algaway 5.4
ProGuard Copper Algicide	Spa Selections Algaecide	ChemTreat CL-2030	Microbe-Lift Algaway 5.4 (For Ponds)
SoftSwim Algicide A	Spa Selections Maintenance Kit	ChemTreat C-206T	Microbe-Lift Algaway 5.4 (For Aquariums)
SpaGuard Oxidizer Enhance Shock	Bonide MossMax RTS	ChemTreat CL-2427	BromMax 7.1
BioGuard Inhibit Algae All 60	Brandt T.A.C.	Chemtreat C2063T	ENVIROBROM G
BioGuard Arctic Blue Winter Kit 12	Liquid Copper Sulfate	BioTreat 8405	BromMax
BioGuard Arctic Blue Winter Kit 24	KTND	CDB Clearon Granular Industrial	Enviro-Brom Tabs
Pro Series Algaecide	WSCP	Water Biocide	Peragreen 22
Pro Series Dual-Action Algaecide	Busan 1215	ClearGold Tablets	BCDMH Tabs
BioGuard Inhibit Back Up 2	Bulab 8861	Easy Pool Care Technology	Bromide-Plus
BioGuard Maintain Brominating Tabs	Busan 1202	Bio-Clear 1000	Peragreen 22WW
BioLab T-0041	Busan 77	Bio-Clear 2000	Perasan OG
SoftSwim A	Busan 85	Bioclear 2500 Antimicrobial	Peragreen WW
BioGuard Algae Complete	Bulab 6004	BioClear 2250 Antimicrobial	EnviroChlorite 15
BioGuard Arctic Blue Algae Protector	Coolacide	BioClear 1430 Antimicrobial	ChlorCide
Algae makes me mad! Angry Egg Algaecide	MB-1000	BioClear 2256 Antimicrobial	Peragreen 15%
BioGuard Burnout 73	MB-60B Granules	Bio Clear 5000	Essick Air Humidifier Bacterostatic Treatment
BioGuard CLC Classic	Bacticide-45B	CYPHOS 3453W Phosphonium Salt	B-Cap 35 Antimicrobial Agent
ProGuard Calcium Hypochlorite Granular	MB-1563B	Plexcide P5S	B-Cap 27 Antimicrobial Agent
BioGuard Salt Scapes Saltwater Pool Care Algae Remover	MB-215	TOLCIDE TP5	B-Cap 34 Antimicrobial Agent
BioGuard Remedy Banish	Check-Mark 40224	TOLCIDE TP50	Vigorox SP-15 Antimicrobial Agent
BioGuard Maintain Smart Shock	Copper Sulfate Crystals	Decco Ag PAA	VigorOx Oil & Gas
BioGuard Inhibit Algicide 28-40	SCI-62 Algicide/Bactericide	Formula F-30 Algae Control	VigorOx 15/23 Antimicrobial Agent
BioGuard Off Season Winter Algicide	CB-3939	B.I.O. Blast 500	VigorOx Oil & Gas 1
BioGuard Remedy Spot Kill	Chem-Aqua 42171	GAX-26	VigorOx Oil & Gas Plus 1
BioGuard Maintain Power Chlor	Chem-Aqua 40215	AquaVet Algae Control	Quimag Quimicos Aguila Copper Sulfate Crystal
BioGuard Maintain Super Soluble	Chem-Aqua 42100	AquaVet Copper Sulfate Algae Control	FQS 1.5 Microbicide
BioGuard Off Season Artic Blue Algae Protector	Chem-Aqua 40420	Ercopure 25	Spec-Aid 8Q704 (Stick)
	Chemical Treatment CL-2150	Ercocide CP	Spectrus CT1300
	ChemTreat C-2185	Ercopure 31	Spectrus NX102
	Chemical Treatment CL-206	Pristine Blue	Spectrus NX1100
	ChemTreat CL-49	Agritec	Spectrus NX1103
	Chemical Treatment CL-215	Algae Shield	Spectrus NX1104
	Chemtreat CL2490	Cleanwater Blue	
	Chemtreat CL-2062	Earthtec	
	ChemTreat CL2065	Aqua Balance Poly 60	

Spectrus OX103  
 Spectrus TD1100  
 iSolv Bio 2000  
 iSolv BIO1010  
 Spec-Aid 8Q704 (Stick)  
 Spectrus NX102  
 Spectrus OX101  
 Spectrus OX9200  
 Spectrus TD 1000  
 Biomate MBC 781  
 Biomate MBC 2881  
 Spec-Aid 8Q5700ULS  
 Spec-Aid 8Q703ULS  
 Spectrus NX1107  
 Spectrus OX103  
 Spectrus NX 1101  
 Spectrus NX 1102  
 Spectrus OX 1202  
 Spectrus OX101  
 Spectrus OX105  
 Spectrus OX1200  
 Spectrus OX909  
 Spectrus NX1106  
 Spectrus OX1201  
 SHOXIDIZER  
 Algimycin Winter  
 Super Charge II  
 GLB Triple Tab  
 Algae-X  
 Sirona Spa Care Bromine Start-Up  
 Kit  
 GLB Dual Control Shock and  
 Algaecide  
 GLB Nix  
 GLB Yello-Free Algaecide  
 GLB Aqua Silk Algaecide  
 GLB Swamp to Swim I  
 GLB Swamp to Swim Shock System  
 Bromine-Free Chlorine-Free Sirona  
 Spa Care Simply Start-Up Kit  
 Algimycin 600  
 GLB 3 Part System Pool Closing kit  
 Spot Gone II

Super Charge  
 GLB Endura  
 Sirona Spa Care Spa Minerals  
 GLB Algimycin 3000  
 Rendezvous Spa Specialties Deluxe  
 Chlorinating Spa Care Kit  
 GLB Sonic Blue Multipurpose  
 Shock  
 Rendezvous Spa Specialties Deluxe  
 Brominating Spa Care Kit  
 Algimycin 1000  
 Algimycin 2000  
 Formula 315  
 Formula 325  
 Formula 3051  
 Formula 318  
 Formula 3340  
 Formula 3230  
 BARDAC 2210  
 BE-6 Industrial Bactericide  
 Aldacide G  
 BE-9  
 BE-9W  
 Biobor JF  
 Sodium Hypochlorite Solution 10%  
 Sodium Hypochlorite 12.5%  
 Freestyle Calcium Hypochlorite 65  
 ProTeam Supreme  
 Proteam Mustard & Black Magic  
 Proteam Quick Shock  
 ProTeam Prevent  
 ProTeam Severest Algae Treatment  
 ProTeam Polyquat 60  
 Swim Clear Black Algaecide  
 Swim Clear Super Algaecide  
 Swim Clear Jumbo Tabs  
 ProTeam Power Magic AC+  
 Superoxidizer  
 Proteam Power 73  
 Proteam Polyquat 30  
 Aquamate Algaecide 30  
 Aquamate Algae Control  
 Proteam Mustard & Black Magic

Quick Shock  
 Spa Pure Brominating Tabs  
 Haviland Algae Kil 50  
 Haviland Algae Kil CB 7  
 Haviland Mustard Eliminator  
 ProTeam Poly Magic  
 Aqua Hawk CU  
 Spectrum RX9800  
 Biosperse 250  
 Spectrum XD8800 Microbiocide  
 Agent  
 Spectrum RX3500 microbiocide  
 agent  
 Biosperse 271 microbiocide  
 Biosperse XD9400 microbiocide  
 Spectrum RX9600 Microbiocide  
 Agent  
 Biosperse CX1150 Microbiocide  
 Spectrum RX3101 Microbiocide  
 Agent  
 Spectrum RX6800 Microbiocide  
 Agent  
 Biosperse CX9071 Microbiocide  
 Biosperse 515 Microbiocide  
 Biosperse CN8109-NA Microbiocide  
 Spectrum RX3510 Microbiocide  
 Agent  
 Biosperse CX9989 Microbiocide  
 Spectrum RX9500 Microbiocide  
 Agent  
 Biosperse CX3400 Chlorine  
 Stabilizer  
 Spectrum RX7845-NA Microbiocide  
 Agent  
 Biosperse XD9411 Microbiocide  
 Spectrum RX6805 Microbiocide  
 Agent  
 Biosperse CN6500 Microbiocide  
 Biosperse CN7539 Microbiocide  
 Biosperse CX7250 Microbiocide  
 Biosperse CN8450 Microbiocide  
 Biosperse CX3195 Chlorine  
 Stabilizer

Spectrum XD1878 Chlorine  
 Stabilizer  
 Biosperse CN2150 microbiocide  
 Biosperse CN4200 microbiocide  
 Biosperse CN5500 Microbiocide  
 Biosperse CN8059 microbiocide  
 Biosperse CN8109 microbiocide  
 Biosperse CX9969 Microbiocide  
 Biobrom C-103L  
 Fuzzicide Solution  
 Sodium Bromide-comp  
 Biobrom C-103  
 AR900 Series Algae Resistant Roof  
 Granules  
 Copper Color Guard Algae-Resistant  
 Roofing Granules  
 In The Swim Calcium Hypochlorite  
 In The Swim Algaecide  
 In The Swim Super Algaecide  
 In The Swim Algae Clear  
 In The Swim Super Pool Shock  
 In The Swim Pool Shock  
 In The Swim 1-Inch Tablets  
 In The Swim Sticks  
 In The Swim Algaecide 50  
 In The Swim Black Algaecide  
 In The Swim Winter Algaecide  
 In the Swim Di-Zap  
 Predator 5000  
 Ercopure BCD-25  
 Ercopure BCD-7.5  
 Micron CSC (Various Colors)  
 Interspeed 640 (Various Colors)  
 Regatta Baltoplace Racing Finish  
 VC-Offshore (Various Colors)  
 Fiberglass Bottomkote Racing  
 Bronze Y999  
 Interspeed 340NA BQA357 Red  
 Aqua-One (Various Colors)  
 Micron WA (Various Colors)  
 Micron Navigator (Various Colors)  
 Micron Extra SPC (Various Colors)  
 Ultra (Various Colors)

Inerlux Micron CSC HS (Various Colors)	Valvtet Marine Premium Diesel Additive with BioGuard Microbiocide	Leisure Time Spa Algaecide	MC B-8614A
Super ProGuard (Various Colors)	Valvtect Bioguard PLUS 6	Dantochlor RW	MC B-8625A
ProGuard Ablative (Various Colors)	Ultima SR-40 Ablative A/F Bottom Paint (various colors)	Dantobrom RW	MC B-8626A
MicronCF (Various Colors)	Pettit Hydrocoat Ablative Antifouling Paint (various colors)	Dantogard Preservatives	MC B-8642A
MICRON OPTIMA (Various Colors)	Pettit Pontoon Pro Copper-Free Antifouling Paint-Black	Dantogard XL-1000	MC B-8650A
Interspeed 5640 (Various Colors)	Pettit Hydrocoat ECO Copper Fee Multi-Season Ablative (various colors)	Dantogard Plus Industrial Preservative	MC B-8910
Trilux 33 (Various Colors)	Pettit Neptune 5 Hard Hybrid Ablative Antifouling Paint (various colors)	Isocil	MC B-8901
Pacifica Plus (Various Colors)	Pettit HRT Hybrid Reactive Technology ECO Antifouling Paint - Black	Densil FZ Antimicrobial	MC B-8626
ACT with SLIME FIGHTER (Various Colors)	KR-153-SL	Triadine 20 - Lonza Industrial Microbiostat	BC-40
Fiberglass Bottomkote NT (Various Colors)	KR-148NL	Lonza Reputain D20 Bactericide	BC-118
Interspeed 6400NA (Various Colors)	Leslie's Swimming Pool Supplies Algae Control	Lonza Reputain B30 Preservative	BC-215
Micro Extra (Various Colors)	Poolfresh 3" Tablets	Isocil IG-C	NAVA Quick Dissolving Shock
Copper Powder V901	Leslie's Swimming Pool Supplies Power Powder Plus 73	Dantoin BCDMH RW Tablets	NAVA Yellow Algae Remover
Copper Powder V900	Leslie's Swimming Pool Supplies Copper Algaecide	Bardac 2250M	Member's Mark Quality Guaranteed Algaecide 40
VC17m Extra (YBA405 & 406)	Leslie's Swimming Pool Supplies Black Algae Killer	Lonza Microbiocide 50	Member's Mark Quality Guaranteed Chlorinating Granules
VC17m Extra YBA407 Red	Leslie's Swimming Pool Supplies Power Powder Granular 70	Barquat Low Foam Additive	Member's Mark Quality Guaranteed Chlorinating Tablets
Trilux 33 (Various Colors)	In the Swim 3-Inch Tablets	Bardac 2250 Microbiocide	Star Plus 3" Jumbo Tabs
Jack's Magic The Yellow Stuff	In The Swim Algaecide 60 Plus	Isocil RW	Poolbrand Quick Dissolving Shock
Jungle No More Algae Tank Buddies	In The Swim Chlorinating Granules	Dantogard Plus Liquid	Star Plus 8-Ounce Sticks
Jungle Pond Algae Relief	Leslie's Pool Supplies Service & Repair Power Powder Pro 73	Bardac LF 18-50 WT	Star Plus Dichlor Granular
Micropur MP 1	Tektamer 38 A.D.	Bardac LF 1850	Star Plus Yellow Algaecide
AMA-3725	N-2000 Antimicrobial	Barquat Low Foam Algaecide	Great Value Pool Shock
AMA-424	Antimicrobial N20	Direx 4L 24(c )	Great Value 3" Chlorinating Pool Tablets
AMA-350	Veriguard 3003	Algae Destroyer Advanced	Poolbrand 3" Chlorinating Tablets
Fennosurf 586	N-922 Antimicrobial	AlgaeFix	NALCO 60510
FennoSan Q-10	N-5033 Antimicrobial	Pond Care Algae Destroyed Advanced	Acti-Brom 1318
AMA-1750		Pond Care Algae Fix	Nalco 2838
New Water Cycler Pac		Microbial Algae Clean	Nalco 2877
Frog Bam		Top Fin AlgaeGone	EC5114A
Aqua Smarte Chamber		API Pond Algaefix	Nalco EC6110A
Frog Leap ALL-OUT		API Marine Algaefix	EC5122A
Aqua Smarte Plus Cannonball!		AquaTrol 12601	Purate DW
Oxi-King Brom Pac		MC B-8802	NALCO 73002
FROG Pool Tender Chlorine Chamber		MC B-8805	NALCO 7639S
FROG Pool Tender Algaecide		MC B-8807	NALCO 73650S
FROG Pool Tender Mineral Chamber		MC B-8520	Stabrex ST70CAN
		MC B-8501	LegionGuard LG25
		MC B-8904	NALCON 7614
		BC-2545	Nalco 2840

Solid Bionox  
 H150M  
 CoilClear  
 NALCO 60505S  
 EVAC Biocide  
 HYG-25  
 NALCON 60505  
 NALCON 7637  
 NALCO 60615  
 NALCON 240  
 Nalco 7634  
 Nalco 77352  
 B015  
 Nalcon 7639  
 PermaCare PC-12  
 VeliGon TL-M  
 Nalco 77352NA  
 ControlBrom CB70  
 NALCO 7341  
 Nalcon 7649  
 Nalco EC6110A  
 NALCO 60620  
 H-130 Microbiocide  
 STABREX ST70  
 TOWERBROM 960  
 TOWERBROM 991  
 PermaClean PC-11  
 Nalcon 10WB  
 Nalco 7320  
 Nalco 7330  
 Nalcon 7647  
 Nalcon 7648  
 Nalcon 7678  
 Nalco 90005  
 MBC 211-P  
 MBC 215-P  
 MBC 214  
 MBC 175  
 Spa Bromine Tablets  
 One Step Brominating Concentrate  
 Algae Break 90  
 Seaklear 90 Day Algae Prevention &  
 Remover for Pools

Seaklear Yellow Klear Algaecide  
 Seaklear Problem Klear Algaecide  
 SeaKlear Pool Opening &  
 Winterizing Kit  
 No. 85 Algaecide  
 Pan Pads  
 Towerbrom 60M Granules  
 Towerbrom 90M Tablets  
 Technical Sodium Chlorite  
 Technical Sodium Chlorite 31.25  
 31% Active Sodium Chlorite  
 Solution  
 Towerchlor 56 Granules  
 Old Bridge Copper Sulfate Fine  
 Olin Chlorine Liquified Gas Under  
 Pressure  
 Gordon's Pondmaster Copper Sulfate  
 Crystals  
 Gordon's PondMaster SeClear  
 Algaecide & Water Quality  
 Enhancer Ready-To-Use  
 Mildew Check  
 HP AM27  
 PPG MZD 7330  
 PPG MZD 7340  
 PPG MZD 7360J  
 PPG MZD 7340A  
 PPG MZD 7330US  
 X3  
 EZPool PRO  
 Premium 60 Algaecide  
 Quash!  
 Quantum Algigon 30 Algaecide  
 Quantum Algigon C  
 Terminator II  
 Quantum Q-Shock II  
 Aqua Chem keeps water clean 1"  
 chlorinating tabs  
 Aqua Chem keeps water clean 3"  
 Chlorinating Tabs  
 Aqua Chem shocks water clear  
 Shock Plus

Aqua Chem keeps water clean  
 Optimum Chlorinating Granules  
 Pool Essentials Shock  
 Aqua Chem Algae Eliminator  
 Pool Time MaxBlue Algaecide  
 Pool Time All-in-One MaxBlue  
 Chlorinating Granules  
 Pool Essentials Chlorinating Tablets  
 Pool Time Shock MaxBlue2  
 Pool Time MaxBlue Pre-Filled  
 Chlorinating Floater  
 T-0034  
 Pool Time Algicide + Clarifier  
 Pool Time Chlorinating Tabs  
 Pool Time MaxBlue All-In-One  
 Chlorinating Granules  
 Pool Time Algicide 50  
 Aqua Chem Algae Eliminator Max  
 Pool Time Algicide 50%  
 Pool Time MaxBlue 3" Tablets  
 Pool Time Shock MaxBlue  
 Pool Time Algicide MaxBlue  
 Pool Time MaxBlue 1" Tablets  
 Tolcide PS75LT  
 Pool Specialties BLACK  
 ROBACIDE  
 Robarb Pool Specialties Power Blast  
 II  
 Kathon 886 MW Biocide  
 Kathon 893 MW  
 Kathon FP 1.5 Biocide  
 Kathon WT 1.5% Biocide  
 Aquacar DC 4P25 Water Treatment  
 Microbicide  
 Kathon CF 150 Biocide  
 Kathon 725 BF Antimicrobial  
 Klarix 4000 Microbicide  
 Kathon Fuel 15 Biocide  
 Rust-Oleum Marine Coatings Boat  
 Bottom Antifouling Paint (Various  
 Colors)  
 Safer Brand Moss & Algae Killer &  
 Surface Cleaner RTS II

Safer Brand Moss & Algae Killer &  
 Surface Cleaner RTU II  
 Pond Champs Algae X  
 Algaecide/Herbicide  
 Crystal Plex Algae Control  
 Crystal Blue Copper Sulfate Smart  
 Crystals  
 Stock Plex Stock Tank Algae  
 Control  
 Decorative Fountain Algae Control  
 Green X Concentrated Granular  
 Algaecide  
 Captain Liquid Copper Algaecide  
 K-Tea Aquatic Algaecide  
 Captain XTR  
 SeClear Algaecide  
 PAK 27  
 SeClear Algaecide & Water Quality  
 Enhancer Ready-to-Use  
 SeClear G  
 SePRO Total Pond-Clear  
 SePRO Total Pond- Clear G  
 Proxitane WW-12 Microbiocide  
 Pak 27 Algaecide  
 BIO/TEC 15  
 Bio/Tec 081  
 Bio/Tec 14  
 Ultra-Kleen Solution 1  
 Pool Mate Jumbo Tabs  
 Pool Mate Black Algaecide  
 Pool Mate Non-Foaming Algae Rid  
 Pool Mate All-In-1 Swimming Pool  
 3" Chlorinating Tabs  
 Pool Mate Algaecide 50  
 Pool Mate Algaecide 50  
 Marineland Algae Eliminator  
 Tetra Algae Control  
 Tetra Pond Algae Control  
 Tetra Pond Pond Block  
 Tetra Pond Fountain Block  
 Tetra No More Algae-Tablets  
 Sump Buddy MWF Antimicrobial  
 Time Release Tablets

Amical 48	AQUCAR 720 Water Treatment Microbiocide	Acticide RS	Swim Best Black Out Granular 90
Bioban BP-Plus Preservative	AQUCAR DB100 Water Treatment Microbiocide	Acticide L 30	O-ACE-sis Multishock
Bioban BP-10 Preservative	AQUCAR DB20 Water Treatment Microbiocide	ACTICIDE DBU 20	PacifiClear Multishock
Ucarcide 25 Antimicrobial	AQUCAR DB 5 Water Treatment Microbiocide	ACTICIDE IPW 40	PacifiClear Algaecide 10
Ucarcide 50 Antimicrobial	AQUCAR DB100 MUP Water Treatment Microbiocide	Acticide M10S	PacifiClear Algaecide 30
AQUCAR 7140 LT Water Treatment Microbiocide	Bioban BP-M Preservative	Acticide LA	PacifiClear Algaecide 60 Plus
Aquacar GA 50 MUP Water Treatment Microbiocide	Aquacar GA 50 Water Treatment Microbiocide	Acticide LA 1206	Swim Best Cal-Shock Cal Hypo Granules
Aquacar PS 20 Water Treatment Microbiocide	AQUCAR GA 25 Water Treatment Microbiocide	Acticide LA 1209	FreshWater Spa Care Kit
Aquacar TA 64 Water Treatment Microbiocide	AQUCAR GA 30 LT Water Treatment Microbiocide	Acticide IMS	FreshWater Spa Care Kit (Free-Oxidizer)
AQUCAR BP 40 Water Treatment Microbiocide	AQUCAR GA 45 Water Treatment Microbiocide	Acticide MBS 2550	Wet & Forget
Kathon 7G Antimicrobial	AQUCAR GA 15 Water Treatment Microbiocide	Acticide MV 14	Biocide 10
AQUCAR TN 250 LT Water Treatment Microbiocide	Algae Defense	Acticide 45	Zep Biofilm Drain Purge A
AQUCAR GA 4PO Water Treatment Microbiocide	Algae-Off	Acticide PA	Jandy TruGuard
AQUCAR PS 75 Water Treatment Microbiocide	Algae D-Solv	Acticide GA	Jandy TruGuard Cartridge
AQUCAR PS 75 MUP Water Treatment Microbiocide	Scotts 3-In-1 Moss Control Ready-Spray	Acticide OTW	Aqua Pure Algaecide
Tris Nitro	Scotts Moss EX 3-In-1 Ready-Spray	Acticide MBL	SKILL-IT Swimming Pool Algaecide
Aquacar Sump Buddy DB 40 TL Water Treatment Microbiocide	S-W Seaguard Copper Bottom AF #45-Various Colors	Aquamate DB20	Aquamate Shock
Aquacar TN 25 Water Treatment Microbiocide	Acticide CT	Pink Treat Algicide	Divergard 42960
AQUCAR A 78 Water Treatment Microbiocide	Acticide B20	Yellow Treat Algicide	MicroClear
AQUCAR TN 50 Water Treatment Microbiocide	Acticide BW20	Green Treat Algicide	Pro-Treat 151
AQUCAR BP 10 Water Treatment Microbiocide	Acticide 14-CF	No Mor Problems Prevent Algicide	Pro-Treat-151 Pan Treatment
AQUCAR BP 30 Water Treatment Microbiocide	Acticide 45-CF	Swamp Treat	Asurity Pro-Treat-151
AQUCAR BP 30 Water Treatment Microbiocide	Acticide WP	Yellow Treat 2	AquaPrime NeoKlor
AQUCAR 714 Water Treatment Microbiocide	ACTICIDE OTW 45	Hydrothol 191 Aquatic	AquaPrime Peraside 15
AQUCAR 714 Water Treatment Microbiocide	ACTICIDE SPX	Hydrothol Granular	Algea Clean Out
AQUCAR 742 Water Treatment Microbiocide	Acticide LA 1205M	Symmetry NXG	TopFin Algae Remover Algicide
AQUCAR 742 Water Treatment Microbiocide	Acticide MKS 1U	Mold Armor Concrete Driveway and Sidewalk Cleaner	Clearview Quat Power
AQUCAR BP 100 Water Treatment Microbiocide	Acticide OTW	Protech Algaecide 60 Plus	Clearview Algaecure
	Acticide LA 1016	Protech Maintenance Algaecide	ClearView Poly Power 60
	Acticide MKW2	Protech ProShock Cal Hypo Granules	ClearView Copper Strike
	Acticides MBS	JT-1 Starch Preservative	ClearView Poly Power 30
		PacifiClear 3 Month Algaecide	Clearview Shimmer N'Shock
		Focus Algaecide 10	Clearview Insta-Chlor Super 73
		Focus 3 Month Algaecide	Zinc Pyrion 48% Aqueous
		Focus Algaecide 60 Plus	Dispersion Industrial Microbiostat
		O-ACE-sis 3 Month Algaecide	Zinc Pyrion 48% MPF
		O-ACE-sis Algaecide 60 Plus	Irgarol 1051
		Swim Best Maintenance Algaecide	Irgaguard D 1071
		Swim Best Algaecide 60	ConBlock MIC
		Swim Best Copper Algaecide	

Smartpond Green Stop Liquid	EcoBlast Contact Granular	Americhlor Calcium Hypochlorite	Biotrol BT
Algaecide	Algaecide	Granules	Biotrol 102
Pond Boss Algaesolv	Aqueon Algae Remover	Power Pro Tabs	Biotrol 250
Pond Boss Pro	K-Bac 1020	VersaChlor System Chlorinating	Biotrol 114
RoCide IS-2	K-Brom 40	Tablets	Biotrol 150
Bell Performance-Bellicide	K-Brom-T	Clorox Pool&Spa Algaecide +	Biotrol 407
Durobrom	K-BAC 1005	Clarifier	Biotrol 509
DuroCide C100-G	K-BROM G	Clorox Pool & Spa Active 99 3"	Biotrol 515
DuroKlor 56	K-BAC 1000	Chlorinating Tablets	Super Shock- Rx Clear
KEM-TEK Pool & Spa Care Power	K-BAC 7015	Clorox Pool & Spa Algaecide Xtra	50% Algaecide- Rx Clear
99 3" Chlorinating Tablets	K-BAC 4020	Blue	Mega Shock-Rx Clear
KEM-TEK Pool & Spa Care All-In-	K-BAC 4075	Clorox Pool & Spa Green Algae	Rx Clear 7% Copper Algaecide
One Algaecide	CMB-6	Eliminator	Rx Clear Chlorinating Tablets
KEM-TEK Pool & Spa Care Spa	K-BAC 2050	Clorox Pool & Spa Shock Xtra Blue	Rx Clear 60% Poly Algaecide
Brominator Tablets	Mizzen Algaecide	Clorox Pool & Spa Xtra Blue 3"	BioRCK 2512W
KEM-TEK Pool & Spa Care 60%	Cape Furl	Long-Lasting Chlorinating Tablets	BioRCK 1036W
Algaecide Concentrate	PoolRx	Clorox Pool & Spa All-In-One Xtra	BioRCK 1036
KEM-TEK Pool & Spa Care Shock	PoolRx+	Blue Chlorinating Granules	BioRCK 1037
Quick 10	5-in-1 Multi-Purpose Tabs	XtraBlue Chlorinating Tablets	BioRCK 1038
Aqua Guard Green Algaecide	Avancid 75	Chlorinating Tablets	BioRCK 1029
Pro Side 3" Chlorinating Tablets	Avancid DB20	Clorox Pool & Spa Shock XtraBlue2	BioRCK 1032
HDX Chlorinating Liquid	Avancid DB98	Clorox Pool & Spa Awesome	BioRCK 1015
Aqua Guard 5-Step Pool Care	AVANCID GL 15	Alagecide	BioRCK 1016A
System Pool Start Up Kit	AVANCID GL 25	Clorox Pool & Spa Active 99 1"	BioRCK 1017A
Aqua Guard All-In-One Chlorinating	AVANCID GL 45	Tablets	BioRCK 1018A
Granules	AVANCID GL 45M	Clorox Pool & Spa Green Algae End	BioRCK 1021
Aqua Guard Black Algae Treatment	AVANCID GL 50	for Small Pools	Tolcide 4Frac 20A
Aqua Guard Chlorinating Sticks	AVANCID GL 50M	Clorox Pool & Spa Texas Blue 3"	Plexcide T20
Aqua Guard Power 99 3"	Algaecide	Chlorinating Tablets	Tolcide PS50AS Industrial
Chlorinating Tablets	Power Powder Plus	Clorox Pool & Spa Goodbye Green	Antimicrobial
Pro Guard Chlorinating Liquid	Induclor 70	Algaecide	Plexcide 15G
Pool Essentials Chlorinating Liquid	Zappit	Clorox Pool & Spa Green Algae	Plexcide 24L
Aqua Guard Swimming Pool	Accu-Tab Blue Calcium	Eliminator2	Plexcide P5
Winterizing Kit	Hypochlorite Tablets	Clorox Pool & Spa XtraBlue	Tolcide TP5W
Aqua Guard Mustard Algaecide	Induclor	Algaecide	Plexcide P5W
Aqua Guard Algaecide 60%	Super Zappit	Borax 10 Mol FG	Plexcide G15
Concentrated	Power Powder Pro	Justeq07	Plexcide 20BR
Aqua Guard 1" Chlorinating Tablets	Incredipool	TMB-471C	Plexcide 5BR
Aqua Guard 3" Chlorinating Tablets	Zappit 73	TBM-25 - Sodium Chlorite	AS-521
Aqua Guard Algaecide & Clarifier	Accu-Tab Wastewater Tablets	Champion Pool Shock	AS-592
IonGen Probe	Indutabs Induclor Calcium	The Bug Bomb	AS-790
Algaecide	Hypochlorite Tablets	Biotrol 536	AS-521
		Biotrol 550	CWT-Cooling Water Treatment



Payzone 8102BCD  
Payzone 814BCD  
Payzone 815GLUT  
Payzone 820THPS  
Payzone 865BCD-W  
Payzone 802BCD  
Payzone 875THPS-A  
Payzone 8102BCD  
Payzone 825GLUT  
Payzone 845BCD  
Payzone 845BCD-W  
Payzone 850THPS  
Payzone 855GLUT  
Payzone 865BCD  
Dutrition Tablet  
BIOC16779A  
BIOC12031A  
BIOC16388A  
BIOC11139W  
BIOC16779A  
Aquatabs InLine  
BIO-909  
BIO-909  
Compass THPS  
Compass THPS 50  
Compass THPS 35  
Biocide 3725  
Biocide 1410  
Biocide 1400  
Brom Tabs No. 2500  
Br-Plus  
CRBiocide 15  
pHin Mineral Purifier for Pools &  
Hot Tubs  
Coastal Cal Jet Algaecide  
Shock X-Tra  
Chlorine X-Tra Stabilized  
Chlorinating Granules  
Coastal Long-Lasting 1"  
Chlorinating Tablets  
Utikem Mini Slow Dissolving  
Chlorinating Tablets  
Coastal Concentrate 50 Algaecide

Coastal Long-Lasting 3"  
Chlorinating Tablets  
Guardian Chlorinating Tablets  
Algae X-Tra 90-Day Algaecide  
Algae X-Tra 90-Day Liquid  
Algaecide  
Dry Chlorinator Granular  
BioAdvanced Science-Based  
Solutions 2-in-1 Moss & Algae  
Killer & Cleaner Ready-To-Spray  
MossBuster RTU  
Imagitarium Algae Reducer  
Blue Micro-B-Gone  
Bromiguard Tablets  
Hot Tub Serum Total Maintenance  
Algae Guard  
Austin's Pool Tech Algaecide  
Pondmaster Algaecide  
IGL 25 Antimicrobial  
AlgaeBlaster  
BCS 3024CF  
Kuriverter IK-110  
Promex CMT1.5  
Promex CM14  
Hydrex 7958  
Hydrex 7611 MQ  
Chem Copp HP III  
Purple Copp  
LoLo Tint  
Aqua Clear Pool Products 1"  
Chlorinating Tablets  
Aqua Clear Pool Products 3"  
Chlorinating Tablets  
Aqua Clear Pool Products Pool  
Algaecide  
Aqua Clear Pool Products Pool  
Shock  
BioBrom BT  
Ultimate Defense High Copper  
AntiFouling Paint (Various Colors)  
Yacht Shield Premium Multi Season  
Ablative (Various Colors)

Ablative Plus Premium Antifouling  
Paint (Various Colors)  
Main Stream 635  
Algaecide/Bactericide  
Bionix BP10  
Bionix ISO2A  
30 SECONDS Spray & Walk Away  
PAACT 22  
MAV AquaDoc Chlorinating  
Granules  
Lake Guard Blue  
Chlor No More Orb  
Old Man Winter Orb  
Grotamar 71 (CNA)

## Washington

APSA-80 ALL PURPOSE SPRAY  
ADJUVANT CONCENTRATE [11  
PHT FASTSTRIKE [15  
PHT QUARK [14  
CONQUER [2  
DIAMULSE C EMULSIFIER [8  
BUFFER P.S. [35  
INDUCE [46  
R-56 SPREADER STICKER /AG  
SPRAYS [39  
REGULAID [1  
ACTAMASTER SOLUBLE  
CRYSTAL SPRAY ADJUVANT  
[99  
GUNSMOKE WATER COND  
AGENT ACIDIFIER/ACTIVATOR  
[260  
BRONC PLUS DRY-EDT [56  
TRI-FOL ACIDIFIER &  
BUFFERING AGENT [40  
POWER-LINE ACIDIFIER P [4

POWER-LINE SURF-90 [3  
POWER-LINE METHOIL [2  
POWER-LINE CROP OIL [1  
AD-SPRAY 90 NONIONIC  
SURFACTANT [53  
CLIMB ALKALINITY AGENT [91  
PRO AMS PLUS [10  
PRO 90 SPREADER-ACTIVATOR  
[11  
BRANDT SUPER 7 [29  
DRIFT CONTROL [5  
REVERSE [3  
MSO CONC W/ LECI-TECH [180  
WEATHER GARD COMPLETE  
[179  
ALLIGARE WATER  
CONDITIONER [62  
WL 83-17 [13  
80/20 SURFACTANT NON-IONIC  
SURFACTANT [117  
SPREADER 90 [116  
POWER-LINE FAST TRAK [5  
FOAM OUT [10  
PHT LOAD UP [33  
SB-56 [15  
WETCIT [2  
AGRISOLUTIONS N-PAK AMS  
LIQUID [81  
BUFFER PROTECT [1  
BRANDT ORGANICS  
DEFOAMER [38  
FOAMINATOR DRY [87  
SILICONE DEFOAMER 10% [8  
PHT KICKERPLUS DRY [20  
DIAMULSE CX [11  
DIAMULSE D [12  
ANTIHOAM C [13  
FERROBRITE B [16  
FERROBRITE AQ [14  
FERROBRITE D [17  
ANTIHOAM D [19  
BRUSH & BASAL OIL [125  
WATER-RITE [19-1

COMPADRE [178  
ATTACH SPREADER-STICKER  
[135  
CHOICE WEATHER MASTER  
[133  
PHASE [142  
COMPLEX [49  
VADER [244  
BOND MAX SPREADER  
STICKER DEPOSITION AID [243  
BREAK THRU S-321 [2  
SUPERB HC [88  
PENETRATOR WA [9  
ANTIFOAM K [26  
FRACTION [9  
HY-STOP SPRAY BUFFER [100  
CROP OIL M [3  
ACTAMASTER SPRAY  
ADJUVANT [101  
MODIFIED VEGETABLE OIL [5  
TRONIC [10  
S-SUL SPRAYABLE  
AMMONIUM SULFATE 21-0-0 [1  
CROCKERS FISH OIL STICKER-  
SPREADER [1  
NATUR-L OIL SPRAY  
ADJUVANT [6  
TURFGRO SPREADER-STICKER  
[75  
DECCOSOL 408 SOLVENT [17  
IN-PLACE DEPOSITION AID &  
DRIFT MANAGEMENT AGENT  
[49  
TRANSFIX [52  
ANTI-FOAM [14  
QUEST [39  
SILCHEM SAF-1107 [1  
PREMIUM MSO METHYLATED  
SPRAY OIL [56  
BIOENHANCER INSECT  
FEEDING STIMULANT -TANK-  
MIX- [5

ACCELERATOR SPRAY  
ADJUVANT 1  
DECCO 312 BUFFER  
CONCENTRATE [15  
MAINSTAY [27  
SHUR-STIK STICKER [3  
COMPEX EXTRA [12  
FLAME SPRAY ADJUVANT [222  
BUPHER MG ACIDIFIER [6  
SIMULAID SPREADER-  
ACTIVATOR [7  
BRANDT ORGANICS AG AIDE  
[33  
ULTRA PRO [307  
TACTIC [131  
SPRAY GUARD [7  
SCANNER NON-IONIC  
SURFACTANT & ANTI-FOAM  
[249  
UNFOAMER  
ANTIFOAMING/DEFOAMING  
AGENT [250  
WIDESPREAD MAX SILICONE  
SURFACTANT [246  
AGRI-DEX [34  
POWER-LINE SPRAY MASTER [1  
CLASS ACT NG [53  
CORRAL POLY [136  
PROFOAM PLATINUM [1  
FROG LEAP DEPTH CHARGE [16  
SLITHER [237  
MAXIMIZER CROP OIL CONC.  
[238  
TRI-AD 86 [13  
MSO+ CONC [20  
SPRAY-PUT [89  
BORDER MAX [84  
BORDER XTRA 8L [85  
SPRAY 007 [87  
VINTRE [4  
DYNE-AMIC [50  
DEFOAMER XP [34

WA-100 PLUS PENETRATING  
SURFACTANT ADJUVANT [1  
ORGANIC BIOLINK ACIDIFIER  
& PENETRANT [3  
PHT ASCENT 90 [44  
PHT AD-BUFF [27  
PHT GUIDE-IT [28  
CHEMURGICS OR-100 SUPER  
SPREADER [4  
R-AGENT DL [1-1  
OROBOOST [5  
AGRSOLUTIONS COMPLETE  
COMPATABILITY [62-1  
DROPLEX XTRA [210  
AIRCOVER [211  
AGRSOLUTIONS FOAMINATOR  
DRY [87-1  
LEVEL 7 [80  
AGRSOLUTIONS INTERLOCK  
[96  
AGRSOLUTIONS ALLIANCE [70  
WHEELHOUSE PRO [14  
MSO CONC [98  
LIBERATE [97  
LI 700 [96  
HERBIMAX [95  
FREEWAY [94  
BOND [92  
RESTORE [13  
PRO CROP OIL [12  
NALCO STA-PUT PLUS  
DEPOSITION AID [87  
DREXEL PEPTOIL CROP OIL  
CONC [24  
DREXEL SURF-AC 820 NON-  
IONIC SURFACTANT [25  
AMIGO [91  
ACTIVATOR 90 [90  
W.E.B. OIL [69  
CAYUSE PLUS AMMONIUM  
SULFATE & SURFACTANT [45  
COMPETITOR [65  
DEFOAMING AGENT [14

REIGN [143  
HOOK [1  
RUNABOUT 90 [2  
DEFUSER [10  
SOFTNESS [7  
SPHERE 7 [3  
ECOLAB EXSPOR ACTIVATOR  
CONC. [228  
HEL-FIRE [119  
CHS LIQUID AMS [11  
TERMINATOR II [52  
CYGNET PLUS [2  
CRYOFUX P -ANTIFREEZE [22  
ORGANIC BIOLINK  
SURFACTANT & PENETRANT [8  
SUPER SPREAD MSO [55  
COMPLETE COMPATIBILITY [62  
EQUALIZER [8  
VEGETABLE OIL CONC [69  
COMBAT PLUS ANTIFOAMING  
& DEFOAMING AGENT [79  
COVERALL [11  
SAP 17 [12  
MARVEL [9  
TOUCH-N-GO [14  
SPRAY-WET [43  
PHT ENTRY [49  
SPA SELECTIONS BROM-START  
[365  
SYNURGIZE [1  
FOAM BUSTER [77  
SPRAY-START [7  
BIOLINK SPREADER - STICKER  
[7  
GULFSTREAM [185  
FAST BREAK [61  
PRIME OIL [47  
SILKIN [45  
ACTIVATE PLUS [48  
POWERLINE SLAMMER [6  
BREAK THRU [3  
MOR-ACT CROP OIL CONC [61  
R-900 [60

BRONC MAX [59  
 PHT AD-SORB RST [54  
 PHT PIERCE [56  
 AGRISOLUTIONS NOBLE [161  
 BREAK THRU SP 131 [2  
 BLITZ 1 [37  
 INTACT XTRA [24  
 FULL LOAD COMPLETE [7  
 ADURO [159  
 POWERLOCK [162  
 SYL-COAT SILICONE  
 SURFACTANT [119  
 N-TER SURFACTANT /  
 ADJUVANT [120  
 SPRAY-FAST [40  
 SPRAY-SLICK [41  
 DRIFT-FIANT [8  
 ECOLAB BOOST 3201 [271  
 ANTI-FOAM [21  
 PURE & SIMPLE 90% NONIONIC  
 SURFACTANT & ANTIFOAMING  
 AGENT [11  
 WATER-RITE NONIONIC  
 SURFACTANT [19  
 WATER-RITE FC NONIONIC  
 SURFACTANT [18  
 APHOIL [297  
 LEAF LIFE WIDESPREAD  
 ORGANIC SURFACTANT [300  
 SCRIMMAGE [2  
 AUDIBLE 90 [1  
 HAND OFF ACTIVATOR [6  
 MOTION [5  
 BACK FIELD [4  
 COMPLETION [8  
 OFFSIDE [9  
 DECCO 314 BUFFER CONC -  
 ACIDIFIER- [19  
 CADENCE [20  
 M-90 ADVANCED FORMULA [5  
 PHT GRIP [57  
 PHT LATRON B-1956 [61  
 BREAK THRU SP 133 [1

BRONC AMMONIUM SULFATE  
 SOLUTION [70  
 DROPLEX [168  
 BONIDE TURBO SPREADER  
 STICKER CONC [223  
 CIDE-KICK II M [3  
 PHT CROP OIL CONC. [72  
 PHT NUTRIENT BUFFER 10-12-0  
 [46  
 PHT ULTRA DEFOAM-IT [45  
 SIMPLOT SPRAY-RITE [47  
 CHEM SPRAY CROP OIL CONC  
 [12  
 IVC DEFOAMER [14  
 INVADE MSO [15  
 VERIMAX AMS [20  
 VOYAGER 90/10 [22  
 VIXEN AC-L [21  
 DESTINY HC [128  
 DREXEL MES-100 [37  
 MIX-IT [79  
 ELIMINO [78  
 AQUA GUARD STABILIZER  
 CONDITIONER [53  
 FTF DEFOAMER [123  
 RUSH [170  
 ATMOS [182  
 BREEZE [183  
 TURBULENCE [184  
 GENESIS 90 [12  
 HOT-UP ULTRA [2  
 KOPPERS ANTIFOAM 1410 [58  
 DECCO 239 CAUSTIC SODA  
 SOLUTION [25  
 CLARION [24  
 KINETIC [44  
 RE-DUCE [131  
 GROUNDED-W DEPOSITION  
 AID [135  
 CLASP DRIFT RET & DEP AID  
 [136  
 CONTINGENT [141  
 POINTBLANK [33

CROP OIL CONC [128  
 BRONC PLUS DRY [121  
 TRAPLINE PRO [13  
 FIXATE PRO [12  
 MODIFY MG NUTRIENT  
 BUFFER 0-10-0 [1  
 G-MAX [1  
 OROMAX [6  
 SPROUT NIP ACTIVATOR [17  
 HDX STABILIZER  
 CONDITIONER [40  
 HI-WETT [309  
 QUANTUM BIOCHEMICAL  
 ACTIVATOR -USE W/ENHANCE  
 BROMIDE SALT SOLN [23  
 POOLPROOF [38  
 BRANDT TORPEDO [21  
 CHOICE TRIO WATER COND  
 AGENT [339  
 CROSSHAIR DEPOSITION AID &  
 DRIFT MANAGEMENT AGENT  
 [110  
 JUSTIFIED [149  
 ROAD RUNNER 77 [5  
 ORO-RZ [8  
 FRANCHISE -USE  
 W/STROBILURIN FUNGICIDES  
 [256  
 SIL-100 ORGANOSILICONE  
 SURFACTANT [17  
 DIAMULSE T EMULSIFIER [44  
 MEMBERS MARK QUALITY  
 GUARANTEED ALKALINITY  
 BOOSTER [37  
 BRANDT MAGNIFY [22  
 BRANDT SUPER WETTER [23  
 PHT COMP-AD ES [34  
 FOAM ARREST [80  
 SILWET L-77 SURFACTANT [37  
 SPRAY MIX [81  
 AMS 4XL [11  
 PACIFIC PREMIUM COC [6  
 JACUZZI ALKALINITY UP [1

JACUZZI pH ALKALINITY  
 DOWN [6  
 JACUZZI SPA SHOCK OXIDIZER  
 [4  
 JACUZZI pH UP [5  
 HYDRATE PLUS NF [1  
 X-CELERATE [1  
 No. 233 WET-SOL CONC [1  
 No. 235 WET-SOL 99 [2  
 CHEMURGICS MVO CONC [3  
 CHEMURGICS DEFOAMER OR-  
 10 [2  
 CENSE DIVINE SECRETS [14  
 CENSE ISLAND PLEASURES [15  
 CENSE QUIET ESCAPE [16  
 CENSE SIMPLE RITUALS [13  
 DREXEL HAF-PYNT [53  
 VERTEX [19  
 DENALI-EA [136  
 STERILIX ULTRA ACTIVATOR  
 SOLUTION -PART 2 - USE ONLY  
 W/SOLUTION 1 [11  
 STERILIX ULTRA-KLEEN  
 SOLUTION 2 [12  
 BAQUACIL pH DECREASER [350  
 HTH SPA pH INCREASER [376  
 CUT-RATE WATER  
 CONDITIONING AGENT [80  
 MSO COMPLETE PENETRANT [6  
 FIXATE WATER CONDITIONING  
 AGENT [2  
 EMULATE [6  
 HYPERTONIC [7  
 WHEELHOUSE [1  
 AGRISOLUTIONS FAST BREAK  
 [61-1  
 WINFIELD SOLUTIONS INERGY  
 [163  
 TURF FUEL HELIX [1  
 WL MSO [11  
 OUTLAST PRO FOAMING  
 AGENT [16  
 CONFORM DP [10

SURE UP [2  
GLYLOAD [3  
LOAD OUT [4  
FULLOAD HWP [5  
PRELOAD [12  
LOAD OUT-CA [9  
PHT AD-HERE SP [63  
PHT KICKER [55  
SYNBIONT CROP ENHANCER [1  
E-Z MIX COMPATABILITY  
ADJUVANT [337  
PENETRON PENETRANT [315  
BORDER XTRA 8L [11  
SYNC FUNGICIDE ACTIVATOR  
[13  
GUNDOWN MAX [15  
BIOLINK ACIDIFIER [11  
INTACT [23  
DERIVA [20  
ADJUVANT CH - ACID  
ACTIVATOR /CHLORINE  
DIOXIDE [59  
ADJUVANT H - ACID  
ACTIVATOR /CHLORINE  
DIOXIDE [58  
WILCO CROP OIL 98-2 [1  
YARDAGE [7  
DE-pHEAT2 0-16-10 [310  
LOVELAND BARK OIL CARRIER  
& DILUENT [319  
DEFOAMER [9  
FLASHPOINT [8  
POINTBLANK WM [145  
FOAMBUSTER 10 [146  
ANTERO-EA [143  
NALCO 60625 [99  
PENTRA-BARK [1  
WL HILOAD 60-40 [10  
BRIMSTONE [105  
CoACT+ [186.2  
MELT [16  
WOODSIDE [9  
JET+SURF [6

KEM-TEK POOL & SPA CARE  
STABILIZER CONDITIONER [17  
CADO MAX [13  
ALLIGARE MSO WEST [58  
ALLIGARE ANTI-FOAMER [57  
ALLIGARE PATTERN [59  
BIO-WET [1  
BROADSPRED [8  
MONTEREY HERBICIDE  
HELPER CROP OIL CONC [115  
F.S 18 [8  
OVS CONTAINMENT [6  
SORBYX [18  
TRANSPORT PLUS [14  
IMPORT [17  
COLUMBIA RIVER B-52  
BUFFER-ACIDIFIER [8  
COLUMBIA RIVER C-90 [9  
COLUMBIA RIVER SILCOTE  
2000 [10  
PROSOLUTIONS DEFOAMER [1  
WAI INVADE [3  
AERO DYNE-AMIC [52  
VALKYRIE [10  
PHT AD-MAX 90 [68  
PHT VESTIS [69  
PHT VOLARE DC [70  
PLANT HEALTH  
TECHNOLOGIES VESTIS [99  
PACIFIC PREMIUM MSO [8  
PACIFIC PREMIUM DRA [7  
PACIFIC PREMIUM NIS [9  
800 PLUS [2  
GLACIER-EA [138  
SUPER SPREAD MSO [55-1  
PUREAG FOLIAR FEEDER [2  
CLIDOX-S ACTIVATOR [8  
BRANDT ONSITE [17  
EQUINOX STABILIZER-15 [54  
COLOR GUARD -ORGANIC PH  
ADJUSTER [60

ADJUVANT FA -  
HORTICULTURAL TREATMENT  
[64  
ADJUVANT HW ACID  
ACTIVATOR [66  
AVANT XTRA [23  
FORTIFY [22  
LEEWAY [26  
PLANT HEALTH  
TECHNOLOGIES LOAD-UP [71  
PLANT HEALTH  
TECHNOLOGIES AD-SORB RST  
[77  
PLANT HEALTH  
TECHNOLOGIES PERSIST  
ULTRA [74  
PLANT HEALTH  
TECHNOLOGIES VESTIS [75  
PLANT HEALTH  
TECHNOLOGIES VOLARE DC  
[76  
AD-SPRAY 90 NIS [156  
SPECTRA MAX TANK MIX [16  
DIRECT HIT [1  
MOBILIZE [3  
PH BREAKER [6  
AMS/NIS [9  
DYNAMIZE 90 [4  
TRAIL BLAZER [2  
R-AGENT DL [1  
HASTEN-EA [132  
RAINIER-EA [134  
RENEGADE-EA [135  
SYL-TAC-EA [131  
CLASS ACT FLEX [190  
SPRAY-PREP [25  
JACUZZI BROMINE BOOSTER [7  
PENETRATOR 2-0-0 [1  
DREXEL SURF-AC 910 NON-  
IONIC SURFACTANT [26  
FARMWORKS 80/20  
SURFACTANT [14

FARM GENERAL DEFOAMER  
[16  
FARMWORKS DEFOAMER [15  
KEM-TEK POOL & SPA CARE  
STABILIZER CONDITIONER [24  
CROP OIL CONC PLUS [25  
DILIGENCE-EA NW W/  
ACCUSTRIKE TECHNOLOGY  
[141  
EFFICAX [150  
CHEMSURF 90 [240  
HIGH LOAD MSO [1  
RESILIENCE [3  
FBN AMS PRO [1  
FBN AMS 34L [2  
HTH (+) ALKALINITY  
INCREASER [337  
HTH STABILIZER [338  
HTH STABILIZER [338-1  
HTH (-) pH DECREASER [339  
HTH (+) pH INCREASER [340  
BLAZE [15  
HOLD-FAST [14  
FUMA-PRO [20  
HOLLOW POINT [16  
WAI 90-10 [4  
WAI INFERNO [5  
WAI MSO [6  
WAI INFIX [7  
WAI CROP OIL [8  
MILLER NU-FILM 17 [4  
DREXEL HOT MES [56  
GLB pH UP [42  
GLB pH DOWN [41  
GLB ALKALINITY UP [32  
GLB STABILIZER [33  
RENDEZVOUS SPA  
SPECIALTIES ALKALINITY UP  
[35  
RENDEZVOUS SPA  
SPECIALTIES pH DOWN [39  
RENDEZVOUS SPA  
SPECIALTIES pH UP [40

RENDEZVOUS SPA  
SPECIALTIES SPA DECREASE  
[37  
RENDEZVOUS SPA  
SPECIALTIES SPA INCREASE [38  
RENDEZVOUS SPA  
SPECIALTIES pH MAGIC [34  
RENDEZVOUS SPA  
SPECIALTIES BROMA-START  
[36  
ENHANCED SULFATE [5  
SURFACT 50 [7  
ORO-HSMOC [9  
BUFFER PROTECT NT [4  
FALX [15  
FALX [15-1  
ORANGE GUARD SPRAY  
ADJUVANT [3  
SPA SELECTIONS PH  
DECREASER [8  
CNI MSO [4  
MONTEREY MAGNIFY [116  
KNOCKDOWN [36  
DREXEL HUM-AC 820 [39  
TRIO-W [5  
CNI 90-10 [1  
SS 100 NONIONIC SURFACTANT  
[3  
RENDEZVOUS SPA  
SPECIALTIES pH DOWN [39-1  
ALKALINITY UP [24  
QUANTUM STABILIZER [25  
pH DOWN [27  
pH UP [26  
SILCHEM SAF-1327 [2  
STAR PLUS OXIDIZING SHOCK  
& SWIM [52  
ADMIT ALL APPLICATION  
ENHANCERS [2  
HANG UP APPLICATION  
ENHANCERS [4  
HARDWIRE ACTIVATOR [5  
AGPRO PHLAME [1

PRO MULTI-SPRED [5  
MULTI-SPRED [4  
NEW CENTURY OIL SPREADER  
[7  
CROPSMART AIRLINK [4  
COLUMBIA RIVER PINENE S  
SPREADER-STICKER [11  
OVS 90 NIS [1  
OVS PENETRANT [3  
OVS BUFFER [5  
OVS CREMATE [2  
OVS DEFOAMER [4  
DREXEL PINENE II EXTENDER  
& STICKER [23  
DREXEL FOME-KIL [57  
PSYCHO SSP [4  
BRANDT BUFFER-TEN [36  
FLAME SPRAY ADJUVANT [345  
DE-FOAMER FG [24  
pH IN ORANGE PODS pH UP FOR  
POOLS [6  
pH IN YELLOW PODS pH DOWN  
FOR POOLS [7  
MINERAL TECH [1  
BRILLIANCE FOR SPAS pH  
TRUE [356  
SPA SELECTIONS pH  
DECREASER [366  
SPA SELECTIONS pH  
INCREASER [367  
BAQUA SPA pH DECREASER  
[348  
BAQUA SPA pH INCREASER  
[349  
BRILLIANCE FOR SPAS pH  
DECREASER [354  
BRILLIANCE FOR SPAS pH  
inCREASER [355  
HTH SPA pH DECREASER [375  
BAQUACIL pH INCREASER [351  
BRILLIANCE FOR SPAS TOTAL  
ALKALINITY INCREASER [353

BAQUASPA TOTAL  
ALKALINITY INCREASER [347  
POOLIFE EXCL POOL CARE  
COLL ALKALINITY PLUS  
BALANCER [360  
CHLORINE-FREE BAQUACIL  
TOTAL ALKALINITY  
INCREASER [357  
BRILLIANCE FOR SPAS START  
UP [352  
POOLIFE EPPC STABILIZER &  
CONDITIONER BALANCER [361  
POOLIFE EXCLUS POOL CARE  
COLL pH PLUS BALANCER [363  
POOLIFE EXCLUS POOL CARE  
COLL pH MINUS BALANCER  
[362  
PULSAR SUNSCREEN 20  
STABILIZER [364  
HTH SALT POOL CARE  
STABILIZER [358  
HTH SALT POOL CARE pH  
DECREASER [359  
DESCEND [3  
CAPSIL [1  
MILLER NU FILM P [7  
MILLER EXIT [3  
MILLER MIST-CONTROL [6  
POOL BREEZE POOL CARE  
SYSTEM pH DECREASER [416  
90 YEARS OF HTH PERFECT  
POOLS ALKALINITY UP [430  
90 YEARS OF HTH PERFECT  
POOLS STABILIZER [431  
90 YEARS OF HTH PERFECT  
POOLS pH DOWN [432  
90 YEARS OF HTH PERFECT  
POOLS pH UP [433  
NIS 90:10 [5  
PROTYX [10  
PERSIST ULTRA [1  
ELIMINO [7  
VESTIS [8

VOLARE DC [2  
CONVERT [6  
EXCHANGE [12  
OROMAX [6-1  
OROBOOST [5-1  
ORO-RZ [8-1  
WETCIT [2-1  
ORGANOMEX [5  
E-Z WET SA [3  
OVS MSO [8  
OVS CROP OIL CONC [7  
DREXEL PAS-800 [82  
FROG MAINTAIN [31  
NOVITA AMS-A PLUS [1  
NOVITA LIQUID AMS [4  
NOVITA WATER CONDITIONER  
[7  
NOVITA MSO XTRA [5  
STRIKELOCK [216  
DRENCH-PHOS POST-HARVEST  
[19  
HYPER-ACTIVE [40  
TURFGR WATER  
CONDITIONING AGENT [70  
NOVITA DRIFT CONTROL [2  
NOVITA FOAMNOMORE [3  
AMS FREE [10  
COC CROP OIL CONC [8  
DuPONT TPQ89 ADJUVANT [193  
PURE & SIMPLE 90% [30  
OCTANE 90 [31  
NEXY ADDITIVE [2  
NOVITA MSO [9  
RAWWAR [24  
WARRAW [25  
ALPHA-8 [23  
SBC HELIX OA [1  
SPREAD COAT [5  
TANK MAX CA SPRAY TANK  
ACIDIFIER [2  
POLY MAX SPRAY TANK  
ADJUVANT [1  
NOVITA 700 [6

RENDEZVOUS SPA  
SPECIALTIES pH DOWN [39-2  
RENDEZVOUS SPA  
SPECIALTIES pH UP [40-1  
PREFERENCE [63  
CONSTANT BUPH-ER [4  
STICK-IT [6  
HTH SPA BROM-START [379  
POOLIFE PODS ALKALINITY  
PLUS [384  
POOLIFE PODS STABILIZER &  
CONDITIONER [385  
POOLIFE PODS pH MINUS [386  
POOLIFE PODS pH PLUS [387  
SPA SELECTIONS PH  
INCREASER [9  
SPA SELECTIONS BROM START  
[7  
KRISTOL [4  
PENTROL [2  
VINCERO 90 [5  
OBLITERATE [15  
AGRA LO-DRIFT 90 [16  
AGRASYST 90 [14  
HYPERACTIVE [40  
CHS AXON [15  
SURFIX P STICKER [179  
OSO-WET SURFACTANT BLEND  
[10  
ONE-AP XL [2  
BIO-90 [3  
BRANDT ULTRA 90 [24  
LEAF LIFE SLINGSHOT [360  
LEEWAY II [29  
DRI NONIONIC SURFACTANT [6  
FIGHTER-F 10 [161  
HTH PRE-MEASURED WATER  
SOL PODS ALKALINITY UP [388  
HTH PRE-MEASURED WATER  
SOL PODS pH DOWN [389  
HTH PRE-MEASURED WATER  
SOL PODS pH UP [390

HTH PRE-MEASURED WATER  
SOL PODS STABILIZER [391  
90 YEARS OF HTH PERFECT  
POOLS PRE-MEAS OPEN &  
POUR POUCH pH DOWN [398  
90 YEARS OF HTH PERFECT  
POOLS PRE-MEAS WS PODS  
ALKALINITY UP [399  
90 YEARS OF HTH PERFECT  
POOLS PRE-MEAS WS PODS  
STABILIZER [400  
GULFSTREAM FREE [244  
DROP pH [2  
QUINTAIN [91  
BB5 NATURAL CONC [90  
KICKER PRO [94  
AGPRO SYSTEMS SS-9 [2  
RENDEZVOUS SPA  
SPECIALTIES pH UP [40-2  
RENDEZVOUS SPA  
SPECIALTIES BROMA-START  
[36-1  
LOCK-IT II [17  
BRONC TRIPLE [139  
INSIST 90 PLUS SURFACTANT  
[140  
GAUNTLET [95  
LOAD-UP [92  
DECIMATE [93  
QUINTAIN XTRA 8L [96  
PLANT HEALTH  
TECHNOLOGIES BB5 NC [97  
KEYSAL 90 [2  
MAXSO [17  
MAXSO CON [18  
MILLER FOAM FIGHTER [5  
LEISURE TIME pH BALANCE  
PLUS [18  
BRANDT UMBRELLA [26-1  
BRANDT 719 SPREADER [55  
BRANDT 719 SPREADER [55-1  
PURELY HYDRO [1  
ACT360 [8

NUEVE [9  
CROSSLOCK [10  
EMULSE XT [3  
EMULSE CX [4  
DEFOAMER-D [5  
WOODBRITE CQ [6  
CITRIX [32  
CRUZADO [34  
MONTEREY HERBICIDE  
HELPER [37  
AUDIBLE 80 [10  
MCGREGOR CONFORM [13  
CROP OIL M [15  
TEST LABEL 2 FOR UPDATES  
ADJUVANT HP [72  
ADJUVANT CHP [73  
ORGANIC PH-D [67  
DRIFT-X [28  
MCGREGOR DOWNRIGGER [11  
LEISURE TIME ALKALINITY  
INCREASER [11  
LEISURE TIME LIQUID SPA  
DOWN [12  
LEISURE TIME LIQUID SPA UP  
[13  
LEISURE TIME SODIUM  
BROMIDE [14  
LEISURE TIME SPA DOWN [15  
LEISURE TIME SPA DOWN [15-1  
LEISURE TIME SPA UP [16  
LEISURE TIME SPA UP [16-1  
LEISURE TIME PH BALANCE [17  
LEAFLOCK SPREADER  
STICKER [231  
BREAK THRU S-301 [3  
BREAK THRU S-301 [3-1  
TURFGRO BOOSTER II [78  
ULTRA SOFT METAL  
ACTIVATOR - PART 2 OF 2 [16  
CITRI-AMP [1  
FOAM-STOP [13  
BLEYHL CO-OP BUBBLE POP  
[14

NEW CENTURY BUFFER [11  
BLEYHL CO-OP BUFF IT [12  
FORTISOLVE 200 - ACTIVATOR  
FOR USE ONLY WITH  
FORTISOLVE 100 [20  
STRIKE ZONE DF [42  
ZAAR [198  
SALT SOLUTIONS BY ULTIMA  
STABILIZER [11  
SALT SOLUTIONS BY ULTIMA  
pH DOWN [12  
PERADIGM [13  
90 YEARS OF HTH PERFECT  
POOLS PRE-MEAS WS PODS pH  
UP [401  
90 YEARS OF HTH PERFECT  
POOLS PRE-MEAS WS PODS pH  
DOWN [402  
PLANT HEALTH  
TECHNOLOGIES AD-MAX 90 [98  
MICROSOLVE ACTIVATOR  
SOLUTION -USE  
W/MICROSOLVE DISI CLNR [114  
MICROSOLVE SOFT METAL  
ACTIVATOR SOLUTION -USE  
W/MICROSOLVE DISI CLNR [115  
FBS HARMONY [6  
WL 90 [12  
PHT PERSIST ULTRA [17  
PHT KICKER ULTRA DRY [19  
FASTSTRIKE [82  
ACID-RITE TABLETS [38  
CHEMSTATION 35401 -  
ACTIVATOR FOR 35400 [10  
WL CP-50 [16  
NAVA SHOCK OXIDIZER [44  
NAVA ALKALINITY BOOSTER  
[45  
NAVA STABILIZER &  
CONDITIONER [46  
NAVA pH DECREASER [47  
NAVA pH INCREASER [48  
TURF FUEL THE WORKS [2

MILLER SUSTAIN [9]  
 MILLER SPRAY AIDE [10]  
 AQUA CLEAR POOL PRODUCTS  
 CHLORINE STABILIZER [1]  
 AQUA CLEAR POOL PRODUCTS  
 PH DECREASER [2]  
 AQUA CLEAR POOL PRODUCTS  
 PH INCREASER [3]  
 AMPERSAND [1]  
 ACCOMPLICE [3]  
 ARCH DEFOAMER WE [33]  
 DIRECT RS [28]  
 VIGOR [30]  
 NEXUM [32]  
 AVOR [31]  
 BORDER 2.0 [33]  
 TACHEON DUO [38]  
 WL CP-35 [14]  
 SBC OASIS [2]  
 pH IN ORANGE STRIPED PODS -  
 pH UP /HOT TUBS [8]  
 pH IN YELLOW STRIPED PODS -  
 pH DOWN /HOT TUBS [9]  
 STRONGSIDE [6]  
 AMS PREMIUM BLEND MAX [1]  
 SPECTRA PH [2]  
 BRANDT M.S.O. [32]  
 BRANDT UMBRELLA [26]  
 PERAFOAM [7]  
 BRONC MAX [59-2]  
 ANTERO-EA [143-1]  
 TRI-FOL ACIDIFIER &  
 BUFFERING AGENT [40-1]  
 EFFICAX [150-1]  
 BB5 NC ACIDIFIER-  
 SURFACTANT [4]  
 WETCIT [16]  
 WETCIT [16-1]  
 ATTITUDE [18]  
 ORO-4 [19]  
 ULTRASIL 740 [325]  
 ECOLAB BOOST 3201 SM [326]  
 TEST LABEL FOR UPDATES

BRANDT A+ [59]  
 DELTA FORCE [373]  
 QUAD 7 [372]  
 FBN HIGH SURF MSO [6]  
 FBN CROP OIL CONC [7]  
 FBN PUREBLEND MSO [5]  
 STRIKE ZONE DF [42]  
 SURFACTANT FOR HERBICIDES  
 [7]  
 LESCO 90/10 NONIONIC  
 SURFACTANT [189]  
 COVERALL PLUS [15]  
 COLLAPSE [16]  
 INVADE RST [16]  
 DREXEL PRIMARY [72]  
 DREXEL AMS-ALL [71]  
 TYRANT HSOC [5]  
 PHUSE [6]  
 BROADSPRED GREEN [9]  
 LIQUID AMS-D [10]  
 PHT NUTRIENT BUFFER 0-10-0  
 PLUS [26]  
 PHT ESCALATE WATER  
 CONDITIONING AGENT [23]  
 PHT KICKER PRO [48]  
 ECOLAB AQUA BALANCE  
 CHLORINE FREE OXIDIZER -  
 POOL [200]  
 ECOLAB AQUA BALANCE  
 MURIATIC ACID /SWIMMING  
 POOLS [204]  
 ECOLAB AQUA BALANCE  
 DECHLOR REDUCING AGENT  
 [197]  
 ECOLAB AQUA BALANCE POOL  
 CONDITIONER [201]  
 ECOLAB AQUA BALANCE SPF-  
 3050 -SWIMMING POOLS [202]  
 ECOLAB LIQUID K [195]  
 SALT SOLUTIONS BY ULTIMA  
 WEEKLY SALT POOL REFRESH  
 [14]

PHT CROP OIL CONCENTRATE  
 [25]  
 EXCEL 70 [1]  
 ADIGOR ADJUVANT [207.2]  
 METHSOYOIL [7]  
 ORO-NIS [14]  
 RANGE MASTER [11]  
 RANGE MASTER [11-1]  
 OVS REGULATOR [9]  
 OMNIX LDF [42]  
 PERSIST ADVANCED [43]  
 TACHEON SPREAD [39]  
 CORN FOAM [4]  
 AGWET 41 [1]  
 Y-20079 [1]  
 GUNDOWN ELITE [35]  
 TACHEON COMPLETE [37]  
 LV WATER CONDITIONING  
 AGENT, SURFACTANT AND  
 HUMECTANT [40]

## Tennessee

Actamaster Soluble Crystal Spray  
 Adjuvant  
 Lesco Rain-ject (091130)  
 Prefer 90  
 Lescoflo Ultra Granular Superior  
 Non-ionic Wetting Agent For T&O  
 (088600)  
 Pool Style Pool Products Ph  
 Decreaser  
 Poolife Pods Ph Minus  
 Fieldgoal  
 Surfux  
 Hth Pre-measured Water Soluble  
 Pods Ph Down

Kem-tek Pool & Spa Care Spa Ph  
 Plus  
 Lock-in  
 Wcs Crop Oil  
 Strikelock  
 Farm General Defoamer  
 Hth Pre-measured Water Soluble  
 Pods Stabilizer  
 Nu-film-ir  
 Frontpage  
 Cerium Elite  
 Salient 372 Fs Seed Treatment  
 Fungicide  
 Exit  
 Accudrop  
 Leaf Life Organic Water Conditioner  
 Profoam Platinum  
 Mso Concentrate  
 Fast Break  
 Jacuzzi Spa Shock Oxidizer  
 Sedate Max  
 Hth Alkalinity Increaser  
 Phase  
 Phin Orange Striped Pods Ph Up For  
 Hot Tubs  
 Pathfinder Blue  
 Brandt Super 7  
 Contain Max  
 Ps 804 Select (1 Gallon And 2.5  
 Gallon)  
 90 Years Of Hth Perfect Pools Pre-  
 measured Open & Pour Pouch Ph  
 Down  
 Methsoyoil  
 Precinct  
 Amigo  
 Bioamp Aa  
 Break Thru T & O  
 Agrisolutions Level 7  
 Cohere  
 Class Act Ridion  
 Kristol  
 Foaminator Dry

Seaklear Chlorine Free Shock Oxidizer	Topside	41-a Dry-flowable Drift Control Additive	Oro-hsmoc
Dyne-a-pak Spray Adjuvant And Deposition Aid	Pool Style Pool Products Stabilizer	Desikote	Kammo Plus
Cni Defoamer	Polyan	Farm General 80/20 Surfactant	Kem-tek Pool & Spa Care Muriatic Acid
Airtech	Diligence-EA	Green To Clean	Cense Simple Rituals
Tactic	Harrells Spraymax Herbicide	Lescoflo Ultra Wetting Agent Tablet (184900)	E-z Clor pH Up
Cni Agri-oil	Activator	E-z Clor Alkalinity Up	E-z Clor O2 Shock
Pointblank Wm	Spa Ph Decreaser Pods	Voyager 90/10	Completion
Hth Pre-measured Water Soluble Pods Alkalinity Up	Jacuzzi Alkalinity Up	Nzone	Spa Selections Brom Start
Aqua Guard Muriatic Acid 1	Trapline Pro	Farmworks Defoamer	Alligare Mso 1
Maximizer	Emulate	Sustain	Fs Crop Oil Plus Surfactant
Aircover	Resilience	Phuse	Poly Film-r
90 Years Of Hth Perfect Pools Pre-measured Water Soluble Pods Ph Down	Purely Hydro	Atmos	Drexel Hot Mes
Tuff Trax	Spa Ph Increaser Pods	Kem-tek Pool & Spa Care Spa Non-chlorine Shock Oxidizer	Harrells Spraymax Defoamer
Venturi	Agrisolutions Interlock	Pool Essentials Muriatic Acid	Adigor Adjuvant
Cognitive 1	Liberate	Pro Side Muriatic Acid	Bark Oil Blue
Buckhorn Total	Activator 90	Sequel	Scoria X Dry
Oroboost	Thatch Buster	OnTarget	Drexel Pas-800
Scrimmage	Fact-or	Vixen Ac-1	Lesco Hawkeye #069404
Spa Selections Ph Decreaser	Drexel AMS-XTRA	Audible 80	GLB pH Up
Choice Weather Master (Ipi)	Accuquest Wm	Hand Off	Actamaster Spray Adjuvant
Flame	90 Years Of Hth Perfect Pools Pre-measured Water Soluble Pods	Anchor	Lesco Recade Liquid Antifoam #069386
Hth Pre-measured Water Soluble Pods Ph Up	Stabilizer	Drexel Sil-fact Surfactant	Instant Pool Water Conditioner
Wick	KINETIC	Gulfstream	Fireball
Amspread	Shake Down	Promark	Veracity Elite Ii
Equinox Stabilizer-15	Instinct HL	Spa Alkalinity Increaser Pods	90 Years Of Hth Perfect Pools Pre-measured Water Soluble Pods
Drexel Mes-100 Modified Vegetable Oil Concentrate	Herbicide Helper	Yellow Gone	Alkalinity Up
Zaar	Surfate Spray Adjuvant	Fire-zone	Ag 14039
Hydrate Plus Nf	Invade	Clear Spa 104 Spa Solutions Ph Plus	Alligare Buphr
Jacuzzi Ph Up	Drexel Fome-kil	Last Chance	Compadre
Penetron	Microsolve Activator Solution	Harrells Spraymax Crop Oil Concentrate	Soiltrate
Fast Rate	Lesco Ecosential Moisture Manager #084855	Request	E-z Mix
Oculus	Hook Zero	Verimax Ams	Envelop
Kem-tek Pool & Spa Care Stabilizer Conditioner	Audible 90	Iconic	Tyrant
Phin Yellow Striped Pods Ph Down For Hot Tubs	Mso Surfactant	Clidox-s Activator	Hydra-hume A
	W-box	Rawwar	Harrells Spraymax Activator
	Conquer Spray Adjuvant	Farmworks 80/20 Surfactant	Pentrol
	E-z Clor Ph Down	Li 700	Hel-fire
	Smoke	CIDE WINDER	Strike Zone LC
	Intact	Flame Spray Adjuvant	Axon
			Upland Mso



Hth Ph Decreaser  
Mso Concentrate With Leci-tech  
Nzone G1  
Pristiva Liquid Rapid Action  
Stabilizer  
Drop Ph  
Alligare Drift Control  
Verifact  
Protyx  
Poolife Pods Stabilizer And  
Conditioner  
Alligare 7  
Kem-tek Pool & Spa Care  
Swimming Pool Muriatic Acid

Stake  
Invade Rst  
Plex Mate Surfactant  
Lesco 90/10 Nonionic Surfactant  
Clearsurf 90  
Poolife Pods Alkalinity Plus  
Response  
Aqua Guard Stabilizer Conditioner  
Leaf Life Slingshot  
Back Field  
Reign  
Tpq89  
Hth Salt Pool Care Ph Decreaser  
Pool Style Pool Products Alkalinity  
Inceaser  
Induce Ph  
Aqua Guard Alkalinity Booster  
Nanoboost  
Jackhammer Elite  
Sms 200 Soil Surfactant  
Pht Latron B-1956  
Kem-tek Pool & Spa Care Ph Plus  
Bark Oil Lt  
Hydro-pak Command  
Drexel Pinene II Extender And  
Sticker  
Clear Spa 104 Spa Solutions Ph  
Minus

Levesol Defoamer  
Ams 4xl  
Pool Season Non-chlorine Shock  
Gundown Max  
Harrells Siloxane Surfactant  
Rendur Defoamer  
Amp Activator  
Warraw  
Fixate Pro  
Poolife Pods Ph Plus  
Emulsifier Blend  
Green Aid  
Water Conditioner + Surfactant  
Blendex VHC  
Hi-yield Spreader Sticker  
Harrells Spraymax Nonionic  
Penetrant  
Microsolve Soft Metal Activator  
Solution  
Trio  
Ag 13063  
Du Pont TPQ89 Adjuvant  
Cense Island Pleasure  
Infuse  
Offside  
Cense Divine Secrets  
Sure Fire Crop Oil Plus  
Peradigm  
Partition  
Cni 80-20  
Wheelhouse Pro  
Drexel Haf-pynt  
Alligare Mvo Plus 1

Fortify  
Contain  
Seaklear Shock Oxidizer Pods For  
Spas  
38-f Liquid Drift Control Additive  
Wetcit  
90 Years Of Hth Perfect Pools Pre-  
measured Water Soluble Pods Ph Up  
Dc-4

Clearview Chlor Free Shock &  
Swim 15  
Pool Season Alkalinity Up  
Lesco Flo Ultra #084570  
Navigator Hc  
Drexel Lox  
Alligare Trace  
Phase Ii  
Hth Stabilizer  
Drexel Mix  
Weather Gard Complete  
Mso Ultra  
Silenergy  
Linkage  
Boost 3201 Sm  
Harrells Ph Buffer  
Velomax  
Exuro  
Oro-rz  
Spa Selections Non-chlorine Shock  
Oxidizer  
Jagge  
Synurgize  
Phin Orange Pods Ph Up For Pools  
Jackhammer  
Rendur Compatibility Agent  
800 Plus  
Alligare Forestry Oil

Pentra-bark  
Ex Plus  
Purge  
Aqua Guard Ph Down  
V-drift Control  
Civitas Harmonizer  
Soydex Plus  
Raider Tg  
Hy-stop  
Wheelhouse  
Clear Spa 104 Spa Solutions Crystal  
Shock Oxidizer  
Spa Selections Ph Increaser

Drexel Surf-ac 910 Non-ionic  
Surfactant  
H-45  
Aqua Guard Non-chlorine Shock  
Oxidizer  
Spa Oxidizing Shock Pods  
Airlink  
Nzone Max  
Sms 400 Soil Surfactant  
Woodside  
Mediate Plus  
Combust  
16098  
Ad-spray 90 Nis  
Permeate  
Drexel Vegetoil Emulsifier  
Alligare Water Conditioner 1  
Lesco Spreader-sticker #019255  
Gunsmoke  
Drexel Ams-supreme  
Aqua-king Plus  
Attach Non-ionic Spreader Sticker  
Vincero 90  
Yellow Out  
Suffusion Tablets  
Alligare Coc Crop Oil Concentrate  
Aqua Chem Balanced For Clean  
Pools Muriatic Acid

Foliar Nutrient 3  
Hth Spa Non-chlorine Shock  
Oxidizer  
Breeze  
Triple Play  
Impel Red  
Fixate  
Reverse  
Navigator Crop Oil Concentrate  
Chem-stik  
Harrells Spraymax Nonionic  
Spreader Sticker  
Ultra Pro  
Nvincible

Mystic Hc Spray Pattern Indicator  
Ivc Defoamer  
Sms 700 Soil Surfactant  
Voyager 80/20  
Succeed Ultra  
Bioguard Muriatic Acid Contractor  
Strength  
Hyper-Active  
Blastoff  
Between  
Lesco Wet Plus #069383  
Aqua Guard Muriatic Acid  
Yardage  
Poolife Pods Non Chlorine Oxidizer  
Choice Trio  
Nvincible Plus  
Bark Oil  
Foambuster 10  
Harrells Spraymax Nonionic  
Penetrant Plus  
Brewer Ta-39  
Comp-aide  
Trapline Pro Ii  
Fbs Harmony  
Hydro-pak Matador  
Chemsurf 90  
Brandt Indicate 5  
Agri-dex  
Velomax Drt  
Aquicare  
90/10 Surfactant  
Veracity  
Dyne Amic  
Noble  
Kem-tek Pool & Spa Care Spa Ph  
Minus  
Spredde 90/10  
High Load Mso  
Ultra Soft Metal Activator  
Spread Coat  
Herbimax  
Aqua Guard Ph Up  
Boost 3201

Hi-wett  
Clasp  
Citrisan  
Efficax  
Cynder  
Persist@ Ultra  
Hth Salt Pool Care Stabilizer  
Cense Quiet Escape  
Brilliance For Spas Oxidizing  
Tablets  
Traverse D  
Justified  
Nemasan  
Bark Oil Blue Lt  
Valcheck  
Turbulence  
Coact+  
Sitka  
Seaklear Balanced Shock Oxidizer  
For Spas  
Droplex Xtra  
Jette 80/20  
Green Gone  
Agrisolutions Powerlock  
Spreader 90  
Turfvantage Nanoboost  
Bark Oil Red Lt  
Hook  
Agrisolutions Class Act Flex  
Mediate  
Velocity Elite  
Hypertonic  
Savvy  
Winfield Droplex  
Agrisolutions Superb Hc  
Harrells Spraymax Methylated Seed  
Oil  
E-z Clor Clor Save  
Level Best  
Liquid Ams  
Freeway  
Lesco Methylated Seed Oil  
Aquifact

Mon-10  
Drexel Bean

## Appendix D Email From Washington State Registrar On Adjuvant Registration

### **Email excerpt from Washington state's pesticide registrar:**

...You will note that the ingredients column for all the adjuvants contains “no active ingredients.” This is because adjuvants technically contain only inert ingredients. We use the phrase are functioning like an active ingredient. State law requires that the top three PFAs be listed on the label in descending order of concentration, and the TOTAL percentage of all the PFAs be listed as well. If you click on one of the red WA hyperlinks you will be able to view that product's label. If you look at a label you will see that the ingredient statement uses “constituents ineffective as spray adjuvants” (CIASAs) instead of “inert ingredients.”

Unfortunately, I cannot share information on the composition of any of the spray adjuvants. We track the PFA ingredients that are listed on the label and are publicly accessible via PICOL. The CIASAs are not tracked or recorded by us; they appear on the Confidential Statement of Formula only. And as you mention below, we cannot share confidential information.

There is, however, a kind of work-around to getting this data. We use EPA's InertFinder website when we review an adjuvant. ALL spray adjuvant ingredients must be verified as being an inert. If we cannot find them on the website, we will contact the Inerts Branch to have them verify if it is an inert (I've been told they have an internal database that contains more inerts.) The EPA InertFinder website is located here: <https://ordspub.epa.gov/ords/pesticides/f?p=INERTFINDER:1:135638543692::NO:1>. You could enter the CAS numbers on the spreadsheet you sent me into the CAS reg. No. field and see if they come up as a recognized inert....

## Appendix E Lists of PFAS Definitions

**Table 4.** List of PFAS definitions and validated test methods for PFAS substances

Origin of Definition	Number of Chemicals	Definition	Notes on the Used Definition
<b>Buck et al. 2011</b>	268	Detailed in Buck et al. 2011 Perfluoroalkyl and Polyfluoroalkyl Substances in the Environment: Terminology, Classification, and Origins. Integrated Environmental Assessment and Management Vol 7 Num 4pp 513-541.	This is the original modern understanding of PFAS structure.
<b>EPA’s PFAS Master List</b>	9,252	A List of Lists: Per- and polyfluorinated alkyl substances (PFAS) represent a growing, increasingly diverse inventory of chemicals of interest to the general public, scientific researchers, and regulatory agencies world-wide.	US EPA “PFAS Master List of PFAS Substances (Version 2)”; serves as consolidated list of substances spanning and bounded by the lists, defining a practical boundary of PFAS chemical space (within DSSTox) of current interest to researchers and regulators worldwide.
<b>EPA Drinking Water Test Method</b>	18	Compounds positively identified by Method 537.1. Method 537.1 is one of the standard tests used for drinking water throughout the US.	Method 537.1: Determination of Per- and Polyfluoroalkyl Substances in Drinking Water by Solid Phase Extraction and Liquid Chromatography/Tandem Mass Spectrometry (LC/MS/MS) (2018/2020)
<b>EPA Oily Matrix Test Method</b>	28	Compounds positively identified by methods detailed in ‘Analysis of PFAS in Oily Matrix’. This method is a modification of 537.1.	Released Fall 2021, available at: <a href="https://www.epa.gov/system/files/documents/2021-09/epa-pfas-method-in-oil.pdf">https://www.epa.gov/system/files/documents/2021-09/epa-pfas-method-in-oil.pdf</a>
<b>EPA with National Toxicology Program</b>	75	Individual chemicals prioritized for future toxicity testing based on underlying risk.	Per- and Polyfluoroalkyl Substances (PFAS) list corresponds to 75 samples (Set 1) submitted for the initial testing screens conducted by EPA researchers in collaboration with researchers at the National Toxicology Program.

Appendix E continued...

Origin of Definition	Number of Chemicals	Definition	Notes on the Used Definition
<b>State of Maine: "Sum of 6 PFAS" / "regulated PFAS contaminants"</b>	6	"Perfluoroalkyl and polyfluoroalkyl substances" or "PFAS" means a perfluoroalkyl substance or polyfluoroalkyl substance that is detectable in drinking water using standard analytical methods established by the United States Environmental Protection Agency, including regulated PFAS contaminants.	Resolve 2021, Ch.82 - LD129: To Protect Consumers of Public Drinking Water by Establishing Maximum Contaminant Levels for Certain Substances and Contaminants
<b>State of Maine Definition per LD 1503</b>	Unknown	"Perfluoroalkyl and polyfluoroalkyl substances" or "PFAS" means substances that include any member of the class of fluorinated organic chemicals containing at least one fully fluorinated carbon atom.	H.P. 1113 - L.D. 1503 An Act To Stop Perfluoroalkyl and Polyfluoroalkyl Substances Pollution of 2021
<b>OECD</b>	4,730	PFASs are defined as fluorinated substances that contain at least one <b>fully fluorinated methyl or ethylene carbon atom (without any H/Cl/Br/I atom attached to it)</b> , i.e. with a few noted exceptions, any chemical with at least a perfluorinated methyl group (–CF <sub>3</sub> ) or a perfluorinated methylene group (–CF <sub>2</sub> –) is a PFAS.	Issued Fall 2021, OECD attempts to harmonize the chemical structures while explicitly stating that structures alone should not dictate policy.
<b>EPA OPPT</b>	Approximately two pesticide a.i.s	"...a structure that contains the unit R-CF <sub>2</sub> -CF(R')(R''), where R, R', and R'' do not equal "H" and the carbon-carbon bond is saturated (note: branching, heteroatoms, and cyclic structures are included)...."	EPA Office of Pollution Prevention and Toxics "working definition" for PFAS.
<b>Found in Pesticide Container Testing</b>	8 (clearly not a definition but it sets a potential expectation)	Testing done at EPA's Ft Mead in 2020 using a Modified Method 537.1	PFAS compounds detected on/in the containers