

45337-11

8/29/2002

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August 29, 2002

Jock Hamilton
 United Chemical Corp.
 3741 E. Telegraph Road
 P.O Box 429
 Piru, CA 93040

Subject: No Mor Problems
 EPA Registration No. 45337-11
 Submission Dated: 4/30/02
 Receipt Date: 6/10/02

Dear Mr. Hamilton:

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

- new 1 gallon package size
- reintroduction of a table

Condition

1. Remove the heading "Statement of Practical Treatment" it should be replaced by **First Aid**.
2. The current label only references the use of this product with the generic chlorinating and brominating products, therefore you must remove the two trademark products identified at the bottom of your label.
3. Revise the "First Aid" statement to comply with PR Notice 2001-1.

CONCURRENCES

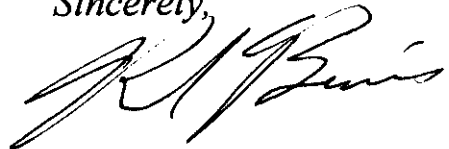
SYMBOL	75100						
SURNAME	Mitchell						
DATE	8-29-02						

First Aid	
If in eyes	<ul style="list-style-type: none"> ■ Hold eye open and rinse slowly and gently with water for 15-20 minutes. ■ Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. ■ Call a poison control center or doctor for further treatment advice.
If on skin or clothing	<ul style="list-style-type: none"> ■ Take off contaminated clothing. ■ Rinse skin immediately with plenty of water for 15-20 minutes. ■ Call a poison control center or doctor for further treatment advice.
If swallowed	<ul style="list-style-type: none"> ■ Call a poison control center or doctor for further treatment advice. ■ Have person sip a glass of water if able to swallow. ■ Do not induce vomiting unless told to do so by the poison control center or doctor. ■ Do not give anything by mouth to an unconscious person.
HOT LINE NUMBER	
<p>Have the product container or label with you when calling a poison center or doctor, or going for treatment. You may also contact 1 (800) xxx-xxxx for emergency medical treatment information. For information on this pesticide (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticide Telecommunications Network at 1 (800) 858-7378.</p>	
<p>Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression and convulsion may be needed.</p>	

A stamped copy of the labeling accepted with conditions is enclosed. Submit three copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

*Should you have any questions or comments concerning this letter,
please contact Wanda Mitchell at (703) 308-6345.*

Sincerely,



*Robert S. Brennis
Product Manager - Team 32
Regulatory Management Branch II
Antimicrobials Division (7510C)*


PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: DANGER. Irritation to eyes, nose, throat, and skin may occur. Avoid contact with eyes, nose, throat, and skin. Do not eat or drink. Do not get on clothing. Wash protective clothing and labor gloves thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

STATEMENT OF PRACTICAL TREATMENT (FIRST AID): IF ON SKIN: Wash with plenty of soap and water. Get medical attention if swallowed. Do not induce vomiting. IF IN EYES: Flush with plenty of water. Call Physician if irritation persists. Note to Physicians: Probable mucousal damage may contraindicate the use of gastric lavage.

PHYSICAL AND CHEMICAL HAZARDS: Reducing agent. Avoid contact with oxidizing agents other than as described in the directions for use. Add this product to water only. Highest mixing of this product with acid or oxidizing agents may cause the release of poisonous, corrosive hydrogen bromide or bromine gas.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and aquatic organisms.

Manufactured by:

UNITED CHEMICAL CORPORATION
 P.O. Box 428, 9741 E. Telegraph Rd.
 P.M., CA 95060
 For Technical Assistance Call:
 (800) 524-5550 (800) 824-5550 FAX: (877) 521-1018
 E-mail: info@unitedcorp.com www.unitedcorp.com

ACCEPTED with COMMENTS
 EPA Letter Dated:

AUG 29 2002

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 45337-11

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with the directions on the label. For information on the Federal Insecticide, Fungicide, and Rodenticide Act, see the label. Do not use this product in a manner inconsistent with the directions on the label. Do not use this product in a manner inconsistent with the directions on the label. Do not use this product in a manner inconsistent with the directions on the label.

PREVENTATIVE ALGAE

For use to prevent the onset or return of algae, when used mixed and to provide year-round crystal clear water in any type swimming pool.

INGREDIENTS:

Active ingredients	41.4%
Inert ingredients	58.6%
Total	100.0%

NO MORE ALGAE!
 Contains no lead
KEEP OUT OF REACH OF CHILDREN
DANGER

See side and back panels for additional precautionary statements

Net Contents 1 Gallon (128 fl.oz.) (3.785 liters)


PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: DANGER. Irritation to eyes, nose, throat, and skin may occur. Avoid contact with eyes, nose, throat, and skin. Do not eat or drink. Do not get on clothing. Wash protective clothing and labor gloves thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

STATEMENT OF PRACTICAL TREATMENT (FIRST AID): IF ON SKIN: Wash with plenty of soap and water. Get medical attention if swallowed. Do not induce vomiting. IF IN EYES: Flush with plenty of water. Call Physician if irritation persists. Note to Physicians: Probable mucousal damage may contraindicate the use of gastric lavage.

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PREVENTATIVE ALGAE

For use to prevent the onset or return of algae, when used mixed and to provide year-round crystal clear water in any type swimming pool.

INGREDIENTS:

Active ingredients	41.4%
Inert ingredients	58.6%
Total	100.0%

NO MORE ALGAE!
 Contains no lead
KEEP OUT OF REACH OF CHILDREN
DANGER

See side and back panels for additional precautionary statements

Net Contents 1 Gallon (128 fl.oz.) (3.785 liters)


PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: DANGER. Irritation to eyes, nose, throat, and skin may occur. Avoid contact with eyes, nose, throat, and skin. Do not eat or drink. Do not get on clothing. Wash protective clothing and labor gloves thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

STATEMENT OF PRACTICAL TREATMENT (FIRST AID): IF ON SKIN: Wash with plenty of soap and water. Get medical attention if swallowed. Do not induce vomiting. IF IN EYES: Flush with plenty of water. Call Physician if irritation persists. Note to Physicians: Probable mucousal damage may contraindicate the use of gastric lavage.

PHYSICAL AND CHEMICAL HAZARDS: Reducing agent. Avoid contact with oxidizing agents other than as described in the directions for use. Add this product to water only. Highest mixing of this product with acid or oxidizing agents may cause the release of poisonous, corrosive hydrogen bromide or bromine gas.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and aquatic organisms.

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Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 45337-11





UNITED CHEMICAL
No More
Problems®
PREVENTATIVE ALGICIDE

For use to prevent the start or return of algae, slime, and mold and to provide year-round crystal clear water in any type swimming pool.

INGREDIENTS

Active ingredient
 Sodium bromide.....41.4%
 Inert ingredients58.6%
 Total100.0%

NO MORE ALGAE!

Contains no ingredients that will stain pools.

KEEP OUT OF REACH OF CHILDREN
DANGER

See side and back panels for additional precautionary statements.

EPA Reg 45337-11

Net Contents 1 Gallon (128 fl.oz.) (3.785 liters)

PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: DANGER. Corrosive. Causes burns. May scar skin and is harmful if absorbed through skin. Causes eye irritation. Do not get in eyes, on skin, or on clothing. Wear protective clothing and rubber gloves. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

STATEMENT OF PRACTICAL TREATMENT (FIRST AID):
IF ON SKIN: Wash with plenty of soap and water. Get medical attention. **IF SWALLOWED:** Drink promptly a large quantity of water. Do not induce vomiting or give anything by mouth to an unconscious person. Avoid alcohol. Call physician or Poison Control Center. **IF IN EYES:** Flush with plenty of water. Call physician if irritation persists. **Note to Physicians:** Probable mucosal damage may contraindicate the use of gastric lavage.

PHYSICAL AND CHEMICAL HAZARDS: Reducing agent. Avoid contact with oxidizing agents other than as described in the directions for use. Add this product to water only. Negligent mixing of this product with acids or oxidizing agents may cause the release of poisonous, corrosive hydrogen bromide or bromine gas.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and aquatic organisms.

Manufactured by:



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 Piru, CA 93040

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 E-mail: info@swimpool.com www.swimpool.com

ACCEPTED
with COMMENTS
EPA Letter Dated:
AUG 29 2002

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act as
 amended, for the pesticide,
 registered under EPA Reg. No. *45337-11*

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DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with labeling. Always add No Mor Problems® directly to pool or spa water. No Mor Problems® is for the maintenance of clear algae free swimming pool and spa water. If a rescue treatment is needed to control an algae bloom, use Yellow Treat®, Pink Treat®, Green Treat®, or Black Treat® according to the directions for use. TO PREVENT THE START OR RETURN OF YELLOW, MUSTARD, PINK, BLACK AND GREEN ALGAE, PINK AND WHITE SLIME, AND PINK AND WHITE WATER MOLD, AND TO PROVIDE YEAR-ROUND CRYSTAL CLEAR WATER IN SWIMMING POOLS AND SPAS TREATED WITH CHLORINATING OR BROMINATING PRODUCTS:

INITIAL TREATMENT: Make initial treatment with No Mor Problems® when starting preventative treatment. For Swimming Pools: For each 5000 gallons pool water, add 3 fluid ounces of No Mor Problems® DIRECTLY to the pool water. For each 5000 gallons pool water, add chlorinating product directly to the pool water. Use the recommended dosage rate for chlorination from the label of an EPA-registered chlorine product. DO NOT DIRECTLY MIX No Mor Problems® WITH THE CHLORINATING PRODUCTS. Before swimming, use test kit for measuring chlorine levels, as directed on your chlorinating product label. Do not enter or swim until the chlorine residual drops to 3 ppm.

Pool Size	AMOUNT No Mor Problems®	AMOUNT Chlorine OR Bromine
5,000 gallons	Add 3 ounces	Add 1/4 pound or 1/4 gallon
10,000 gallons	Add 6 ounces	Add 1/2 pound or 1/2 gallon
15,000 gallons	Add 9 ounces	Add 3/4 pound or 3/4 gallon
20,000 gallons	Add 12 ounces	Add 1 pound or 1 gallon
25,000 gallons	Add 15 ounces	Add 1 1/4 pounds or 1 1/4 gallons

MAINTENANCE TREATMENTS WITH NO MOR PROBLEMS®: Use No Mor Problems® when adding chlorinating or brominating products directly to the pool water for pool maintenance. Use the recommended dosage rate from the label of an EPA-registered chlorine or bromine product. Add 5 to 6 fluid ounces of No Mor Problems® per pound (dry) or gallon (liquid) of chlorinating product added. When using Lithium Hypochlorite as a source of chlorine, add 3 fluid ounces of No Mor Problems® per pound of Lithium Hypochlorite. When using chlorine produced by a chlorine generator, use 6 fluid ounces of No Mor Problems® per pound (dry) or gallon (liquid) of chlorinating product. When adding bromine for pool maintenance, add 5 fluid ounces of No Mor Problems® per pound of brominating product. Before swimming, use test kit for measuring chlorine levels, as directed on the chlorinating product label. Do not enter water or swim until the chlorine residual drops to 3 ppm.

Quantity of each chlorine OR bromine source: No Mor Problems®

1 gal. liquid chlorine, 1 lb. dry chlorine or shock,
two 3 inch tablets or trichloro-s-triazinetriene, and
1 lb. bromine 5 fluid ounces

1 lb. trichloro-s-triazinetriene and 1 lb. chlorine
produced by a chlorine generator 6 fluid ounces

Example:
If add 1 gal. liquid chlorine and
2 lb. or trichloro-s-triazinetriene,
add 17 fl. oz No Mor Problems®

$[5 + (2 \times 6) = 17]$

STORAGE AND DISPOSAL:

Do not contaminate drinking water, food, or feed by the use, storage or disposal of this product. **STORAGE:** Store in a dry, well ventilated area out of reach of children and away from oxidizers. Keep container closed when not in use.

DISPOSAL: Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. Container Disposal: Do not reuse container, but place in trash collection. Rinse thoroughly before discarding in trash.

®Baquecil is a registered trademark of Zeneca.
Schwimm is a trademark of Biotab



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