



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

September 27 2012

Cristina Griffin, Agent for KIK Pool Additives, Inc c/o Delta Analytical Corp 12510 Prosperity Drive, Suite 160 Silver Spring, MD 20904

Subject

Kem Tek All-in-One Chlorinating Granules

EPA Registration Number 7616-70

Letter Date July 17, 2012

EPA Receipt Date July 18, 2012

Dear Ms Griffin

The label amendment, submitted in connection with registration under section of the federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable

Proposed label amendment

- Add reader's notes throughout label for clarification
- Add and delete alternate brand names & optional label claims, including kit language
- Change company name
- Update First Aid, Precautionary Statements, Environmental Hazards, and Storage & Disposal language

General Comments

A stamped accepted copy of the label is enclosed for your record. This amendment and a copy of this letter have been placed in this product's file for future reference. Should you have any questions or comments concerning this letter, please contact Eliza Blair via email at <u>blair eliza@epa gov</u> or by telephone at (703) 308-7279

Sincerely

Monisha Harris

Product Manager (32)

Regulatory Management Branch II

Antimicrobials Division (7510P)

KEM TEK ALL-IN-ONE CHLORINATING GRANULES

[Previously approved Alternate Brand Names] Agua Guard All-In-One Chlorinating Granules Agua Guard Spa Chlorinating Granules

[Previously approved Alternate Brand Names in EPA letters dated 2/8/00 and 2/25/02 but didn't appear on EPA s label 'databasel

Kem Tek Spa Kem Chlorinating Granules Kem Tek Vinyl Pool Shock

Deleting Alternate Brand Name Spa Kem Spa Shock

[Alternate Brand Name to be used with kit containing EPA Reg # 7616-58 70 or -76 [Note that names are repeated on each label because it is not clear which combination of products may be used]

Above Ground Pool Kit

Above Ground Pool Maintenance Kit

Agua Guard Above Ground Pool Maintenance Kit Kem-Tek Above Ground Pool Maintenance Kit Above Ground Pool Start Up Kit

Agua Guard Above Ground Pool Start Up Kit Kem Tek Above Ground Pool Start Up Kit

Above Ground Pool Chemical Kit

Agua Guard Above Ground Pool Chemical Kit Kem Tek Above Ground Pool Chemical Kit

ACTIVE INGREDIENT

Sodium Dichloro-s-triazinetrione-Dihydrate OTHER INGREDIENTS 100 0% TOTAL 4 1 _

[(56 0% available chlorine) or (Available Chlorine – 56 0%) or (AVAILABLE CHLORINE

56 0%)]

KEEP OUT OF REACH OF CHILDREN

DANGER

SEE BACK PANEL FOR FIRST AID STATEMENT AND OTHER PRECAUTIONS IOF SEE FIRST AID STATEMENT AND ADDITIONAL PRECAUTIONS ON BACK PANEL! the See back panel "may be omitted if all labeling is on the same panel e g the kit box

Inde the Fido alin edicide this coe and a a orthe 'e eust edurder

7616

[The following may appear in any appropriate place on the label] Manufactured by [for] KIK Pool Additives Inc

5160 E Airport Dr Ontario Calif 91761

[Optional Following may be included in addition to Manufactured by [for]" address above a Distributed by [or Sold by] [or Marketed by Insert additional company name and address

EPA Reg No 7616 70 EPA Est Nos 7616-CA 01

[Free Pool Care Advice 1-800-SOS-POOL • www kem-tek com]

Call a poison control center [(1-800-222-1222)] or doctor for treatment advice. Have the product container or label with you when calling poison control center or doctor or going for treatiner to If in Eyes Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses if present, after the first 5 minutes then continue rinsing eye. If inhaled Move person to fresh air. If person is not breathing call 911 or an ambulance then give artificial respiration preferably mouth-to-mouth if possible Have person sip a glass of water if able to swallow DO NOT induce vomiting unless told to do so by coison control center or doctor. Do not give anything by mouth to an unconscious person. If on Skin or Cluthing Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Note to Physician Probable mucosal damage may contraindicate the use of gastric lavage. [First Aid may be in table form]

PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals

Danger CORROSIVE Causes irreversible eye damage. May be fatal if inhaled Harmful if swallowed or absorbed through skin. Do not get in eyes on skin or on clothing. Do not breathe dust vapor or spray mist. Wear goggles face shield or safety glasses. Wash thoroughly with soap and water after handling and before eating drinking chewing gum using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.

[For containers smaller than 50 pounds use the following]

Environmental Hazards

This product is toxic to fish and aquatic organisms

[In accordance with PR notice 95-1, use the following complete Environmental Hazards statement for containers 50 pounds and larger]

Environmental Hazards

This product is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes streams ponds estuaries oceans or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

Physical or Chemical Hazard

STRONG OXIDIZING AGENT WILL BURN WITH THE EVOLUTION OF CHLORINE AND EQUALLY TOXIC GASES CONTACT WITH WATER SLOWLY LIBERATES IRRITATING AND HAZARDOUS CHLORINE CONTAINING GASES DECOMPOSES AT 460° F TO 480° F WITH THE LIBERATION OF HARMFUL GASES

Mix only with water. Use clean dry utensils. Do not add this product to any dispensing device containing remnants of any other product. Such use may cause a violent reaction leading to fire or explosion. Contamination with moisture organic matter or other chemicals may start a chemical reaction with the generation of heat liberation of hazardous gases and possible generation of fire or explosion.

IN CASE OF FIRE if possible isolate container in open air or well-ventilated area. Flood with a large volume of water. [IN CASE OF] CONTAMINATION [OR DECOMPOSITION] do not reseal container.

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Optional Label Claims/location optional | [Glaims may be in upper or lower case]
12 Diameter and Under
13 Diameter and Above
[Insert #] [Pack] [Step Pool Care System
ABC Smart[er] Pool Care [System]
Add [Directly to Skimmer] or [Directly to Pool]
Add [dry product] through skimmer or directly to pool
All the Basics Needed for Start-Up and Continued Maintenance
Buffered Sanitizer Shock Treatment for Crystal Clear Water
Built in clarifier
Can Be Broadcast Over Pool
Can be used in salt pools
[Clarifies] [Clears cloudy] water
Compatible with salt pools
Contains # [//#oz ] [Convenient Pre-Measured] Rouches
Contains No Calcium for Calcium Free Into to Transfer who needs a calcium free product for pool
Controls Algae
Convenient skimmer application
Daily Chlorinator & Shock
Destroys [Swimmer Contaminants] [Organic Wastes] [Organic Contaminants]
Dissolves [Completely] [Quickly] [Rapidly]
Do not mix this product with any other product on the following pool surfaces vinyl metallic fiberglass painted or colored plaster. Always dilute in the water direct contact with surfaces will bleach color
Easy skimmer application
Fast: Acting [for Daily & Super Chlorination]
Fast Dissolving [Dichlor Shock] [Shock] [for Swimming Pools]
Fast sanitizer
For Above Ground Pool Start-Up
For all poolisi surfaces including vinyl plaster and fiberglass
For Control of Algae [[&] [And]] Bacteria
For, [Daily] [Everyday] [Shocking] [Chlorination [and/or Shock]
For heavy bather loads or after heavy rains
For pool startup and weekly shock treatment
For Super-chlorination [or Super Chlorination]
For use with all pool surfaces
For use as a Shock
Good for all pool surfaces
Great [Ideal] for Vinyl Rools
Improves filter performance
Keeps water [clean] [crystal clear]
Kills [bacteria] [and/or] [algae]
Lasts Up to 3 Times Longer Than Unstabilized Granules * When used as directed
No Need to Pre-Dissolve
One Bag Treats 10 000 Gallons (change # gallons according to size of package)
Oxidizer
[Part B] [Simply B] [Smart B] [Smarter B] [Step B]
[Part C] [Simply C] [Smart C] [Smarter C] [Step C]
Part of the [Kem Tek] [Simply Smart[er]] [Pool] [Care] [System]
pH balanced
pH Neutral - Reduces pH Adjustments
Pool [and] [&] Spa Care
Pools Patios & Spas
Quality & Satisfaction Guaranteed or your money back
Quick [Chlorine Boost] [dissolving] [formula] [sanitizer] [shock treatment]
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[In the text 'this product or alternate brand name may be substituted for Kem Tek All In One Chlorinating Granules name]
[[Information in brackets[] is optional or instructional italics in brackets indicate instructions not part of labeling]
fishared\KiK Pool Additives\KiT\7616 70 amend label 071712 doc 7/17/12 Page 3 of 10

Reduces [chemical needs] [chlorine odor] [and/or] [eye irritation]

Removes [organic contaminants] [organic waste] and produces sparkling swimming pool water

Restores crystal clarity to pool water

Routine Maintenance Chlorinator

Shock

Shocks water clear

Shock Treatment [and] Super chlorinator for Swimming Pools and Spas

[Simpler] [Smarter]

Stabilized

Step [insert #]

Step [#] [2] [Two] of the Kem Tek Pool Care System

Step [#]2 [Chlorinate] [Treatment]

Step [#]3 [Shock] [Treatment]

Suitable for [opening pools] [closing pools] [use in all pools] [pool winterization]

Suitable for pool closing

Swim [After Use] [In 15 Minutes]

Swimming [pool sanitizer] [Pool Water Disinfectant] The Professional Side of Pool Care

Use for [Above Ground Pool Start-Up] [Opening Pool] [Closing Pool]

Use in Pop-Up Pools

UV protected

Works immediately

Step #1	Step #2	Step #3	Step #4	Step #5
Balance	Chlorinate	Shock	Algae Care	Clarify

[The following wording can vary depending on size of package] For 10 oz package TREATS 8 000 GALLONSI

MAIINTAINLING FOUR POOL IS AS EASY AS







chloriscie

Optional Label Claims/location optional 1

SHOCK TREATMENT

Shocking / Super Chlorinating Your Pool Water

Shock the pool when

- An increased number of swimmers are using the pool
- Chloramines are present in the water and the chlorine is not effectively working
- The water is cloudy even though a proper chlorine level is maintained

Shocking must be done periodically to remove waste materials like suntan oils perspiration body oils and other organic waste

SHOCK-SCHEDULE

Summer – Once per week

Spring – Twice per month

Winter – Once per month

KEM TEK™ Al-L-IN-ONE CHLORINATING GRANULES Features & Benefits Dissolves Quickly / Controls Algae and Bacteria

The best time to shock is early evenings with the pool circulating system in operation. This way the sun will not reduce the effectiveness of the treatment

[READ ALL PRECAUTIONARY STATEMENTS BEFORE USE]

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling

ATTENTION Never mix this concentrated chemical with any other substance except generous amounts of water. See CHEMICAL HAZARDS on this label. The use of KEM TEK™ ALL-IN ONE CHLORINATING GRANULES also requires the one time use of KEM TEK™ STABILIZER CONDITIONER as described in the directions below under Start Up. This two-component system results in a longer-lasting chlorine residual and reduced chlorine consumption. Both products are completely soluble

VINYL-LINED POOL CARE Vinyl-lined pools are easily damaged by chemicals used to treat and maintain pools KEM TEK™ ALL IN-ONE CHLORINATING GRANULES are well suited for use in these pools especially the above-ground pools which have 3-4 foot depths and are not equipped with a bottom drain KEM TEK™ ALL-IN-ON CHLORINATING GRANULES dissolves quickly and completely (is easily pre-dissolved in a bucket of water to help avoid potential problems) so direct contact with the pool liner is reduced and there are not residues to be swept or vacuumed from the pool bottom KEM TEK™ ALL IN-ONE CHLORINATING GRANULES also simplifies pH control because it s pH neutral compared to other forms of chlorinating products which contain calcium hypochlorite sodium hypochlorite and trichloroisocyanuric acid (NOTE Insoluble crystal-forming reaction will result when using sodium bisulfate (dry pool acid) to adjust pH when used in conjunction with calcium hypochlorite) KEM TEK™ ALL-IN-ONE CHLORINATING GRANULES will not cloud water even when super chlorinating which often occurs with calcium hypochlorite products

START UP Step 1 Condition pool water with KEM TEK™ STABILIZER CONDITIONER as per directions on its label. Thereafter regular use of KEM TEK™ ALL-IN-ONE CHLORINATING GRANULES alone will maintain proper stabilization. NOTE Omit Step 1 if pool is already conditioned with a similar stabilizer. Step 2 Concurrently with Step 1 super chlorinate water by adding 10 oz [12 oz or 16 oz]of KEM TEK™ ALL-IN-ONE CHLORINATING GRANULES, per 8000 gallons [10 000 gallons, {for 12oz} or 13 000 gallons {for 16oz}]of pool water. See additional super chlorination instructions below

DAILY CARE After Step 1 and 2 above regularly check chlorine residual with a test kit and chlorinate daily or as needed to maintain 1 0 to 1 5 ppm residual chlorine NOTE One ounce of this product per 5 000 gallons of pool water will increase an existing chlorine residual by 0 8 ppm (1/8 rounded measuring cup = 1 oz) Broadcast KEM TEK™ ALL-IN-ONE CHLORINATING GRANULES directly into the pool water pH Keep pH of water between 7 2 and 7 6 Use KEM TEK™ pH MINUS (dry acid) to lower pH and KEM TEK™ pH PLUS (soda ash) to raise it

SUPER CHLORINATION Whenever the pool water loses its sparkle or turns green or the chlorine residual falls rapidly after regular chlorination super chlorinate Experience shows that during summer months water will need to be super chlorinated with √10 oz [12- oz or 16 oz] of KEM TEK™ ALL-IN-ONE CHLORINATING GRANULES per 8000 gallons [10,000 gallons {for 12oz} or 13 000 gallons {for 16oz}] of pool water every 10 to 14 days Do not use the pool until the chlorine residual has dropped to 3 ppm

GENERAL The following tables are a handy reference to average chlorine requirements but must not be substituted for regular use of a test kit since pools and conditions vary considerably. Test water frequently and chlorinate as needed. Anticipate an increased chlorine consumption with increased swimming, hot water or weather rain a dirty or neglected pool, etc.

TYPICAL DAILY DOSAGE (SUMMERTIME) [After Steps 1 & 2 above]

ABOVE GROUND POOL - 3 to 4 Deep				IN GROUND POOL 7 to 9 DEEP							
Pool Diameter	12 Ft	15 Ft	18 Ft	20 Ft	24 Ft	Pool Size Feet	14x28	16x32	17x34	18x36	'0x40
Approx Gallons	2 500	4 500	7 000	9 000	13 000	Approx Gallons	15 000	20 000	25 000	30 000	3 ⁵ 000
Dosage Ounces	1	2	3	4	5	Dosage Ounces	6	7	8	9 	10

FOR CONTROL OF BACTERIA AND ALGAE (OUTDOORS) IN SPAS

- 1) Before bathing test water pH chlorine residual and alkalinity using a suitable test kit. Adjust chlorine residual to 3.0 ppm. After bathing super chlorinate to 5.0 ppm. (1 level tablespoon per 500 gallons of water). Use a chlorine stabilizer especially for outdoors to proplong chlorine residual. Maintain pH of water between 7.2 and 7.6 and total alkalinity between 125 and 175 ppm with KEM TEK PH PLUS or KEM TEK PH MINUS.
- 2) This product does not affect pH or alkalinity of water. One tenth oz (1/2 tsp) per 500 gal. of water gives 0.8 ppm and 1 level Tbs. gives 5 ppm of chlorine. To use, broadcast granules into water with jets running. Do not use the spa until the chlorine residual has dropped to 3 ppm.
- 3) With bathers in a 500 gal spa a 2 0 ppm chlorine residual can drop below the minimum 1 0 ppm in 15-20 minutes. Less water or more bathers will accelerate loss. Test often and keep chlorine residual above 1 0 ppm.
- 4) Weekly super chlorinate water to 5 or 6 ppm (see 2 above) Re-entry into spas is prohibited above levels of 3 pm of chlorine. Drain and clean spa whenever the water becomes difficult to manage or chlorine stabilizer goes over 100 ppm as measured with a suitable cyanuric acid test kit. Avoid use of products such as body lotion that consume chlorine.

[Reader's Note Throughout this label product names for other similar products (i.e., pH adjusters stabilizers chlorinators etc.) may be substituted as appropriate.]

STORAGE AND DISPOSAL

STORAGE Keep product in tightly closed container when not in use. Store in a cool dry well-ventilated area away from heat or open flame. CONTAINER DISPOSAL IF EMPTY. Nonrefillable container. Do not reuse or refill this container. Place in trash [collection] or offer for recycling if available. IF PARTLY FILLED. Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

[Brand name AQUA GUARD™ or Kem Tek™ may be used]

[optional] 5-Step Pool Care System

ABOVE GROUND POOL [START UP] [MAINTENANCE] KIT [All The Basics Needed for Start-Up and Continued Maintenance]

[FREE POOL CARE ADVICE 1-800-SOS-POOL]

[Contents will include two or more of the following]

Net Contents [or This Kit Contains]

•____Qts [or Gal]

[nsert ABN for 7616-58]

Lbs [Insert ABN for 7616-70]

• 🗽 Lbs

. [ińśert ABN for 7616-76]

- i____l²bs* Kem Tek pH Rlus i Lbs Kem Tek pH Minus
- Floating Tablet Dispenser
- Test Strips and Instructions
- Test Kit and Instructions

[Non-EPA registered products may substitute name for same product]

[Kit contents may be listed on another panel]

KEEP OUT OF REACH OF CHILDREN NO SE DEJE AL ALCANCE DE LOS NIÑOS

DANGER

See back and side panels and individual containers for first aid statements and other of ecautions

[Note Kit is to include EPA registered product labels fully visible on outside kit box as well as on the corresponding container inside the box]

[Optional Kit Label]

[The following may placed on front side or back panel of box and/or as an insert]
[The following will be part of the Above Ground Pool [Start Up] [Maintenance] Kit's instructions]

STEPS FOR USING ABOVE GROUND POOL [START UP] [MAINTENANCE] KIT

Pool Care The Importance of Testing

Without proper testing a pool can quickly become cloudy develop undesirable odors and even become unsafe to use Testing is used to guide you in the treating of water With proper testing this Start-Up Kit provides all the essentials to properly maintain your pool Additional Kem Tek Products [or insert other brand name] are available to correct problems should they occur

Chlorine Chlorine breaks down due to many factors - swimmers water temperature and sunlight In order to prevent growths a chlorine level of 1-3 ppm must be maintained daily Super chlorinate (shock) using the [insert ABN for EPA Reg No 7616-70] to start-up and establish a chlorine level as well at least-once per week to remove any chlorine resistant problems. Use the test strips provided or any other reliable test kit to properly chlorinate the pool water. Use [insert ABN for EPA Reg No 7616-70] [and/or insert ABN for EPA Reg No 7616-76], to maintain daily chlorination (see below)

pH pH is always present in water Keep between 72 and 7,6 to make water comfortable for use. In addition, the other products used in pool care operate best in this range pH control is a process of increasing when it gets below 7.2 with Kem Tek pH Plus or lowering it when it gets above 7.6 with Kem Tek pH Minus* to keep it in the ideal range. If pool pH is low, stop use of pool until pH is adjusted above 7.0.

(Start Up)

Test pH and adjust to 7.2 – 7.6 if necessary. Then super chlorinate (shock) by following the dosage on the chart for your pool size. Once chlorine level is established and between 1.3 ppm proceed with Daily Chlorination. Do not use the pool until the chlorine residual has dropped to 3 ppm

[When Kit Contains EPA Reg No 7616-70]

Chlorination (daily)

Follow the recommended dosage on the chart for your pool size. Treat pool every evening. For pools with above average use treat mid day and in the evening by adding the maintenance dose.

[When Kit Contains EPA Reg No 7616 76]

Chlorination (daily)

Add enough [insert ABN for EPA Reg_No_7616-76] to fill dispenser half way DO4NOT FILE DISPENSER COMPLETELY Adjust dispenser to a mid setting Place dispenser in pool water with chemical release openings facing down Hold dispenser until it floats properly and upright. Test chlorine level periodically Chlorine level must be maintained between 1 3 ppm at all times. Adjust floater setting to increase or decrease chlorine output. Do not use the pool until the chlorine residual has dropped to 3 ppm.

Weekly

Super chlorinate in the evening and when heavy use or rain occurs if water becomes cloudy or algae starts to grow triple this dose to correct the problem Run pump 4 to 8 hours minimum after addition of [insert ABN for EPA Reg_No_7616-70]!

pH Adjustment

Keep between 7 2 and 7 6 When the pH goes above 7 6 add Kem Tek pH Minus and if it is below 7 2 add Kem Tek pH Plus Use chart for dosage Run, pump and check after 2-4 hours. The dose on the chart is only an estimate Repeat as needed until the pH is corrected. Use a half dose when nearing the correct pH level.

Algaecide

The chlorine used to prevent growths in pool water is rapidly consumed by weather conditions and pool use. The addition of Algaecide helps prevent algae from getting started during periods when the chlorine is below 1 ppm. Add Algaecide at least once a month for prevention. Treat weekly for busy pools or hot summer weather. Whenever an algae growth occurs follow the instructions for super chlorination then add algaecide 24 hours after chlorination and chlorinate pccl. o 3 ppm. fineeded

Maintaining Your Pool

Your pool can be kept clean and trouble free by following these instructions. In order for the chemical treatments to be effective the filter system must also be kept clean and in good working order. Hot weather and heavy swimmer load create the need for more chemical treatment and also require that the pump is run more often or for longer periods of time, Run the pump every night after adding chlorine to properly treat the water, in hot weather and with heavy use due to the size of the pump/filter systems on small above ground pools. 24 his, per day circulation is recommended Also after every major storm or above normal users focking the pool must be done to prevent problems.

[Readers Note Throughout this laber product names for other similar products (re-pH adjusters stabilizers chlorinators etc.) may be substituted as appropriate.]

PooliSize 12 ZandiUnder		KEM TEKT All In One Chlorinating Granules		pHiPlus/pHMinus to raise or lower pH		l≟quidi∕Aigaecide		
			Shock Tibs	(Choose One)		(Choose @ne)		
Diameter//Depth	Gallons	Daily lisp	Tibs	์ เมื่อรั้ง	Cups	Tibs	Čůpš	
6. X424.	500	2	1	4	174	4	1/4	
8.X.30	1¥0000	4	2	8	1/2	8	<u>1</u> 7/2	
1'0 3 X\$36	1∲500	Ĝ	3	ส์2ิ	37,4	£12	3/4	
111×X136	2 000	8	4	ส์ดี	,Ĩį	16	រា	
12 X 42	2 500	70	5	20	1478	20	11/8	
Pool(Size)12 Jand	ŖööliSıze¶2√andiUnder		ĶĒMŢĒĶ™ AllĦn-Onê Chlorinating Granules		pH Plus/pH Minus to raise or lower pH		Ŀiquid Algaecide	
Diameter/sDepth	Gallons	Daily Tsp (Shock Tibs	<u> </u>	űpś	©ups		
13.X4.	3₹5000	3	17/3	11/4		14/4		
15-X-4,	5=000	6	2/3	2		1 1/2		
18 X 4	7 500	8	1	3		2		
21 X 4:	10 000	ão	11/3	4		3		
24, X.4.	13₹500	112	182/3	5 4		4		

*8 TBS≡1/2 cup

[fijne following] information may be used fon the insertior panel containing (this information location optional)



[¿The following must appear in any appropriate place on the box label [and also may appear on the insert]]

Manufactured by [for]

KIKI Pool Additives; Inc.

5160 E Aliport Dr. Ontario Calif 91761

[@ptional lFollowing may be included in addition to Manufactured by [for] laddress above Distributed by [or Sold by] [or Marketed by] Insertiadditional company name and address]