

January 23, 2003

Mr. Mike Jennings
Manager, Regulatory Affairs
LPM Manufacturing, Inc.
3925 E. Broadway Rd., Suite 100
Phoenix, AZ 85040

Subject: **Leslie's Algae Control**
EPA Registration No. 11411-11
Application dated December 9, 2002

Dear Mr. Jennings:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are not acceptable for the following reasons:

Proposed Amendment:

- update basic formulation (see CSF dated 12/9/02)
- revised labeling

Major Deficiencies:

1. The basic Confidential Statement of Formula (CSF) is incorrect. You must revise the CSF to include the following:

- Signature of Approving Official
- Box "10" must specify the purity of 60%
- Box "7" must specify the type of density used
- Box "17" must specify the total weight
- Box "13" must specify 100:(60.0) % by weight, 103: (61.8) upper limit, and 97: (58.2) lower limit

General Comments:

The following label revisions must be made:

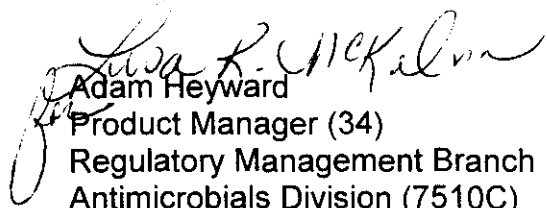
1. Delete the term "Highly" from the sentence highly effective both as a preventative and as a corrective treatment on most forms of algae. The word "Highly" implies heightened efficacy as compared to other similar products.

2. Please explain why a re-entry time is not required for this product.

A stamped copy of the accepted labeling is enclosed. Submit (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422, or Lisa McKelvin at (703) 308-7496.

Sincerely,


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

Enclosure

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[Front Panel]

{Optional Language/1 }

{POOL FRESH}
{LESLIE'S SWIMMING}
{POOL SUPPLIES}

ALGAE CONTROL

STEP 4 ALGAE PREVENTER

CONTROLS THE GROWTH OF ALGAE
IN SWIMMING POOLS

Highly Effective Both as a Preventative
And as a Corrective Treatment
on Most Forms of Algae

Highly Concentrated – Will not Stain or Foam

Keep Out of Reach of Children
CAUTION
See First Aid Statement and
Additional Precautions on Back Panel

ACCEPTED
with COMMENTS
EPA Letter Dated:

JAN 23 2003

ACTIVE INGREDIENT:

Poly[oxethylene(dimethyliminio)ethylene
(dimethyliminio) ethylene dichloride] 60%

OTHER INGREDIENTS:40%

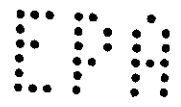
Total100%

This product contains 5.76 lbs. of active ingredient per gallon and weighs 9.6 lbs. per gallon.

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. **1141-11**

EPA Reg. No. 11411-11 • EPA Est. No. 11411-CA-1

NET CONTENTS 1 Quart (946 mL) • LPM 14-025



[Back Panel]

FIRST AID	
If Swallowed	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
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 treatment advice.
If on Skin or Clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</p>	

PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Avoid breathing vapors. Avoid contact with skin, eyes or clothing.

[Environmental Hazard statement for end-use products in containers of less than 5 gallons (liquid)]
ENVIRONMENTAL HAZARD: This pesticide is toxic to fish and aquatic organisms.

[Environmental Hazard statement for end-use products in containers equal to or greater than 5 gallons (liquid)]

ENVIRONMENTAL HAZARD: This product is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other 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: Do not mix with other chemicals.

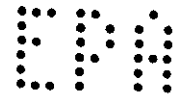
DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

READ ALL PRECAUTIONARY STATEMENTS BEFORE USE

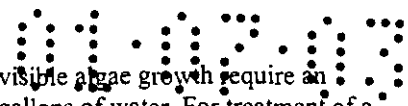
HOW TO USE: Leslie's Algae Control is used to control the growth of algae in swimming pools, exterior spas, whirlpools, hot tubs, decorative fountains and ponds that do not contain fish. For maximum effectiveness, pools, spas, whirlpools, hot tubs, decorative fountains and ponds containing heavy growth of algae should be cleaned prior to using this product.

ROUTINE USE: For pools having just visible algae growth add an initial dose of 11 to 16 fluid ounces of Leslie's Algae Control per 10,000 gallons of water and remove settled algae. For treatment of freshly cleaned and filled pools, add 6 to 11 fluid ounces of Leslie's Algae Control per 10,000 gallons of water. Subsequent additions of 2 to 4 fluid ounces of Leslie's Algae Control per 10,000 gallons of water should be made every 5 to 7 days after initial treatment for maintenance.

585



[Back Panel]



Spas, whirlpools, hot tubs, decorative fountains and ponds having just visible algae growth require an initial dose of 1 to 2 fluid ounces of Leslie's **Algae Control** per 1,000 gallons of water. For treatment of a freshly cleaned spa, whirlpool, hot tub, decorative fountain or pond, add 0.6 to 1.1 fluid ounces of Leslie's **Algae Control** per 1,000 gallons of water. Subsequent additions of 0.2 to 0.4 fluid ounces of Leslie's **Algae Control** should be made every 5 to 7 days after initial treatment for maintenance.

Leslie's **Algae Control** will prevent growth of most algae during the off-season winter months when pools are not in use. For pools that have been properly treated during the swimming season and are free of visible algae, add 6 to 10 fluid ounces of Leslie's **Algae Control** per 10,000 gallons of water. If at the end of the swimming season pools have some visible algae growth, add 12 to 16 fluid ounces per 10,000 gallons. It is necessary that a uniform distribution of Leslie's **Algae Control** throughout the water and the pool be made for maximum effectiveness. If pool is not covered, it may be necessary to repeat the treatment one or more times during the season.

Leslie's **Algae Control** is compatible with those chemicals normally used to treat pools and spas and is effective at both acid and alkaline pH. Leslie's **Algae Control** can be used in pools and spas treated with chlorine chemicals and may reduce the amount of those chemicals normally required. However, **do not mix** Leslie's **Algae Control** with concentrated dry or liquid chlorine products.

STORAGE AND DISPOSAL:

STORAGE: Do not contaminate water, food or feed by storage or disposal. Keep product dry in its original, tightly closed container when not in use. Store container in a cool, dry, well ventilated area away from heat or open flame. Storage area should be locked and inaccessible to children. **CONTAINER DISPOSAL:** Do not reuse empty container. Thoroughly rinse empty container with water then place in trash or offer for recycling if available.

LPM Manufacturing, Inc.
3925 E. Broadway Road
Phoenix, AZ 85040
www.lesliespool.com

Bar Code/UPC

