



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

April 30, 1997

Ms. Cynthia Smith
Technology Sciences Group
United Chemical Corporation
P. O. Box 429
Piru, CA 93040

RE: "No More Problems" (EPA Reg. No. 45337-11)
Your revised labeling fax transmission dated April 29, 1997

Dear Ms. Smith:

The labeling referred to above, submitted in connection with registration under the amended Federal Insecticide, Fungicide, and Rodenticide Act is acceptable subject to the comments listed below. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

Under cover of the May 9, 1996 Agency letter to you, a Data Evaluation Record (DER) was transmitted in which Dr. Carol E. Glasgow, on page two of the DER, identifies exactly how the statement of practical treatment must read. Our review of the subject label notes that the "If swallowed" statement on the label is incomplete. Specifically, the following statement -- "physicians: Probable mucosal damage may contraindicate the use of gastric lavage" -- is absent from your label.

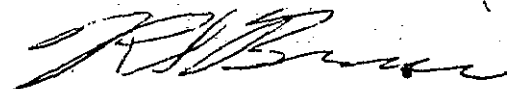
Please revise the your label to include the statement quoted above, as requested in Dr. Glasgow's February 27, 1996 memorandum, and submit at least one finished label to the Agency prior to releasing the product for shipment.

A photocopy of the subject label stamped "Accepted with Comments" is enclosed for your records, and an additional copy is being included in the regulatory file jacket for the product.

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If you have any questions or concerns, please call me at (703) 308-6264, or Killian Swift of my staff at (703) 308-6346.

Sincerely yours,



Robert S. Brennis,
Acting Product Manager 32
Regulatory Mgmt. II
Antimicrobials Div. (7504C)

Enclosure

ACCEPTED
with COMMENTS
in EPA Letter Dated:

4-30-97

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

45337-11

No Mor Problems® Preventative Algicide
EPA Registration No. 45337-11
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(Front Panel)

No Mor 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 or spa

NO MORE ALGAE

Wait 1 hour before swimming after initial treatment

INGREDIENTS

Active ingredient

Sodium bromide

41.4%

Inert ingredients

58.6%

Total

100.0%

Contains no ingredients that will stain pools or spas.

KEEP OUT OF REACH OF CHILDREN

DANGER

See back panel for additional precautionary statements.

Net Contents: 1 Quart (32 Fluid Ounces)

EPA Reg. No. 45337-11

EPA Est. No. 45337-CA-1

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(Back Panel)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER. Corrosive. Causes burns. Concentrate may scar skin and is harmful if absorbed through skin. Concentrate causes eye irritation. Do not get concentrate in eyes, on skin or on clothing. Wear protective clothing and rubber gloves. Wash thoroughly with soap and water after handling concentrate. Remove contaminated clothing and wash 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 milk, egg white, gelatin, or, if these are not available, large quantities of water. Do not induce vomiting. Avoid alcohol. Call physician or Poison Control Center.

IF IN EYES: Flush with plenty of water. Call physician if irritation persists.

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.

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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 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.

No Mor Problems® may be used to maintain pools and spas treated with Yellow Treat®, Pink Treat, Green Treat™, Black Treat, Winter Treat™, Spring Treat or Take Out.

Wait at least 1 hour after treatment with No Mor Problems® before entering pool or spa. Observe the required waiting period for a product used with No Mor Problems® if greater than 1 hour.

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 CHLORINE OR BROMINE:

INITIAL TREATMENT WITH NO MOR PROBLEMS®

Make the initial treatment with No Mor Problems® when starting a preventative treatment. For each 5000 gallons pool or spa water, add 3 fluid ounces of No Mor Problems® DIRECTLY to the pool or spa water. For each 5000 gallons pool or spa water, SEPARATELY add chlorine (1/4 pound OR 1/4 gallons) OR 1/4 pound bromine DIRECTLY to the pool or spa water. DO NOT DIRECTLY MIX NO MOR PROBLEMS® WITH CHLORINE OR BROMINE.

Pool or Spa Size	Amount of No Mor Problems®	Amount of 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 pound or 1 1/4 gallon

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MAINTENANCE TREATMENTS WITH NO MOR PROBLEMS®

Add chlorine or bromine as directed according to the product label. Add No Mor Problems® when adding chlorine or bromine.

For the quantity of each chlorine OR bromine source listed below:	Add the following quantity of NO MOR PROBLEMS®:
gallon of liquid chlorine	5 fluid ounces
pound of dry chlorine or shock	5 fluid ounces
two 3-inch jumbo tablets of trichloro-s-triazinetrione	5 fluid ounces
pound of trichloro-s-triazinetrione	6 fluid ounces
pound of chlorine produced by a chlorine generator	6 fluid ounces
pound of bromine	5 fluid ounces

EXAMPLE: If add 1 gallon of liquid chlorine and 2 pounds of trichloro-s-triazinetrione, add 17 fluid ounces of No Mor Problems®. $[5 + (2 \times 6) = 17]$

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TO PREVENT THE 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 *BIGUANIDE, BAQUACIL OR SOFTSWIM*:

INITIAL TREATMENT WITH NO MOR PROBLEMS®

Make the initial treatment with No Mor Problems® when starting a preventative treatment. For each 5000 gallons pool or spa water, add 3 fluid ounces of No Mor Problems® DIRECTLY to the pool or spa water. For each 5000 gallons pool or spa water, SEPARATELY, add 1 quart of hydrogen peroxide DIRECTLY to the pool or spa water. DO NOT DIRECTLY MIX NO MOR PROBLEMS® WITH HYDROGEN PEROXIDE.

Pool or Spa Size	Amount of No Mor Problems®	Amount of hydrogen peroxide
5,000 gallons	Add 3 fluid ounces	Add 1 quart
10,000 gallons	Add 6 fluid ounces	Add 2 quarts
15,000 gallons	Add 9 fluid ounces	Add 3 quarts
20,000 gallons	Add 12 fluid ounces	Add 4 quarts
25,000 gallons	Add 15 fluid ounces	Add 5 quarts

MAINTENANCE TREATMENTS WITH NO MOR PROBLEMS®

Add hydrogen peroxide as directed by the Biguanide, Baquacil or Softswim label. Add 1 fluid ounce of No Mor Problems® for each 4 fluid ounces of hydrogen peroxide added.

Amount of Hydrogen Peroxide	Amount of No Mor Problems®
Add 8 fluid ounces	Add 2 fluid ounces
Add 16 fluid ounces	Add 4 fluid ounces
Add 24 fluid ounces	Add 6 fluid ounces
Add 32 fluid ounces	Add 8 fluid ounces
Add 40 fluid ounces	Add 10 fluid ounces

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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 the 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

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incinerate, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Manufactured by:
United Chemical Corporation
3741 E. Telegraph Road
Piru, CA 93040

800-824-5550 (California)
800-524-5550 (other states)

U.S. Patent Nos. 4,846,979 and 5,254,526. Additional patents pending.

Baquacil is a registered trademark of Zeneca, Inc.
Softswim is a registered trademark of Bio-Lab, Inc.
Yellow Treat, Pink Treat, Green Treat, Black Treat, Winter Treat, Spring Treat, Take Out and No Mor Problems are registered trademarks of United Chemical Corporation.