

46043-29

4/27/2007

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

April 27, 2007

Kathy Kollen  
EPA Coordinator  
Suncoast Chemicals Company  
14480 62<sup>nd</sup> Street North  
Clearwater, Florida 33760

Subject: Trouble Free  
EPA Registration No. 46043-29  
Application Date: March 27, 2007  
Receipt Date: April 9, 2007

Dear Ms. Kollen:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

**Proposed Notification**

addition of optional marketing claims

**General Comments**

Based on a review of the material submitted, the following comment applies:

The notification application is acceptable and a copy has been inserted in your file for future reference.

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

Sincerely,

Wanda Y. Henson  
Product Reviewer (32)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

CONCURRENCES

SYMBOL	7510P	7510P					
USERNAME	F. Orj	E. Mitchell					
DATE	4-27-07	5-3-07					



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

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	United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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**Application for Pesticide - Section I**

<b>1. Company/Product Number</b> 46043-29	<b>2. EPA Product Manager</b> Tom Luminello	<b>3. Proposed Classification</b> <input type="checkbox"/> None <input type="checkbox"/> Restricted
<b>4. Company/Product (Name)</b> Suncoast Chemicals Company / Trouble Free	PM#	
<b>5. Name and Address of Applicant (include ZIP Code)</b> Suncoast Chemicals Company 14480 62nd Street North Clearwater, FL 33760  <input type="checkbox"/> Check if this is a new address	<b>6. Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____  Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Notification of additional claims as highlighted on page 5 of attached master label. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to the EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Section - III**

**1. Material This Product Will Be Packaged In:**

<b>Child-Resistant Packaging</b> <input type="checkbox"/> Yes <input type="checkbox"/> No	<b>Unit Packaging</b> <input type="checkbox"/> Yes <input type="checkbox"/> No	<b>Water Soluble Packaging</b> <input type="checkbox"/> Yes <input type="checkbox"/> No	<b>2. Type of Container</b> <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt.      No. per container	If "Yes" Package wgt      No. per container

<b>3. Location of Net Contents Information</b> <input type="checkbox"/> Label <input type="checkbox"/> Container	<b>4. Size(s) Retail Container</b>	<b>5. Location of Label (Directions)</b> <input type="checkbox"/> back
<b>6. Manner in Which Label is Affixed to Product</b> <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other: _____		

**Section - IV**

**1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)**

<b>Name</b> Kathy Kollen	<b>Title</b> EPA Coordinator	<b>Telephone No. (include Area Code)</b> (727) 531-8913
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<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment both under applicable law.	<b>8. Date Application Received (Stamped)</b>
<b>2. Signature</b> 	<b>3. Title</b> EPA Coordinator
<b>4. Typed Name</b> Kathy Kollen	<b>5. Date</b> March 27, 2007



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March 27, 2007

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
USEPA  
Ariel Rios ?Building  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

**RE: Notification of Additional Claims #46043-29 (Suncoast Trouble Free)**

Dear Sir or Madam:

Enclosed is a Notification form of additional claims for our current registration (Suncoast Trouble Free) 46043-29. I have included the EPA Application for Pesticide form and a copy of the label with new marketing claims on page 5.

Thank you for your assistance.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kathy Kellen".

Kathy Kellen  
EPA Coordinator

Enclosures



## Trouble Free

ALGAECIDE

**ACTIVE INGREDIENT:**

Sodium Bromide.....40%

INERT INGREDIENTS:.....60%

TOTAL.....100%

FOR USE TO CONTROL AND PREVENT ALGAE GROWTH AND TO MAINTAIN CLEAR WATER IN SWIMMING POOLS.

FIRST AID	
<b>If On Skin or Clothing</b>	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
<b>If in Eyes</b>	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes. Call a poison control center or doctor for treatment advice.
<b>If Swallowed</b>	Call poison control center or doctor immediately for treatment advice.
<b>HOTLINE NUMBER</b> 1-800-255-3924	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-255-3924 for emergency treatment.	

### KEEP OUT OF REACH OF CHILDREN CAUTION

**Wait at least 1 hour after Trouble Free treatment before entering pool or spa or follow the required waiting period for a product used with Trouble Free if greater than one hour.  
PROLONGED EYES AND SKIN CONTACT MAY CAUSE SEVERE IRRITATION.**

See back label for additional precautionary statements.

[BACK LABEL]

Trouble Free provides crystal clear water and is ideal for all pool surfaces.

#### PRECAUTIONARY STATEMENTS HAZARDS TO HUMAN AND DOMESTIC ANIMALS

**CAUTION:** Wait at least 1 hour before entering pool after treatment with this product. Harmful if absorbed through the skin. Avoid contact with skin and clothing. Wash with soap and water after handling. Remove contaminated clothing and wash before reuse. Do not get into eyes.

#### ENVIRONMENTAL HAZARDS

[For containers less than 50 lbs.] This product is toxic to fish and aquatic organisms.

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Master Label with Additional Claims  
Suncoast Trouble Free

**[For container greater than 50 lbs.]** 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 Board or Regional Office of the EPA.

**PHYSICAL OR CHEMICAL HAZARDS**

Trouble Free is not flammable. Do not allow this product to come into contact with acids or oxidizing agents under conditions 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 release of poisonous corrosive hydrogen bromide or bromine gas. Reducing agent.

**DIRECTIONS FOR USE**

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

**WAIT ONE HOUR AFTER APPLICATION BEFORE SWIMMING.**

**[FOR POOLS USING CHLORINATING DISINFECTION SYSTEMS]**

Trouble Free is used to control and prevent algae growth and to maintain clear water in swimming pools using chlorinating systems.

**INITIAL TREATMENT** for pools using chlorinating disinfection systems. Use to start a preventative treatment program with Trouble Free.

For each 10,000 gallons of swimming pool water, add 6 fluid ounces of Trouble Free directly to the water. Follow the Initial Treatment directions on the chlorinating compound product label. **Do not mix Trouble Free directly with chlorinating compounds.**

Size of Pool	Amount of Trouble Free
10,000 gallons	6 ounces
15,000 gallons	9 ounces
20,000 gallons	12 ounces

**Wait at least 1 hour after Trouble Free treatment before entering pool** or follow the required waiting period for a product used with Trouble Free, if greater than 1 hour.

**MAINTENANCE TREATMENT:** for pools using chlorinating disinfection systems. Use bi-weekly, or as needed to keep water free of algae. Add chlorinating compound as directed on product label for appropriate size of swimming pool. Add the following amount of Trouble Free when adding a chlorinating compound.

Amount of chlorinating compounds	Amount of Trouble Free
1 gallon sodium hypochlorite (liquid chlorinating compound) 10-12%	5 fluid ounces
2 gallons of sodium hypochlorite (liquid chlorinating compound) 5.25%	5 fluid ounces
1 lb of dry chlorinating compound (calcium hypochlorite or dichloroisocyanurate)	5 fluid ounces
2 lb lithium hypochlorite (35%)	5 fluid ounces
Two 3" tablets trichloro-s-triazinetrione	6 fluid ounces
1 lb chlorine produced by chlorine generator	5 fluid ounces

Master Label with Additional Claims  
Suncoast Trouble Free

**Wait at least 1 hour after Trouble Free treatment before entering pool** or follow the required waiting period for a product used with Trouble Free, if greater than 1 hour.

**[FOR POOLS USING BIGUANIDE, BAQUACIL OR SOFTSWIM SYSTEMS]**

Trouble Free is used to control and prevent algae growth and to maintain clear water in swimming pools using Biguanide, Baquacil or Softswim systems.

**INITIAL TREATMENT** for pools using Biguanide, Baquacil or Softswim systems. Use to start a preventative treatment program with Trouble Free.

For each 10,000 gallons of swimming pool water, add 6 fluid ounces of Trouble Free directly to the water. Follow the Initial Treatment directions on the hydrogen peroxide product label. **Do not mix Trouble Free directly with hydrogen peroxide.**

Size of Pool	Amount of Trouble Free
10,000 gallons	6 ounces
15,000 gallons	9 ounces
20,000 gallons	12 ounces

**Wait at least 1 hour after Trouble Free treatment before entering pool** or follow the required waiting period for a product used with Trouble Free, if greater than 1 hour.

**MAINTENANCE TREATMENT:** for pools using Biguanide, Baquacil or Softswim systems. Use bi-weekly, or as needed to keep water free of algae.

Add hydrogen peroxide compound as directed on product label for appropriate size of swimming pool. Separately, add 1 fluid ounce of Trouble Free for each 4 fluid ounces of hydrogen peroxide

Amount of hydrogen peroxide added	Amount of Trouble Free
8 fluid ounces	2 fluid ounces
12 fluid ounces	3 fluid ounces
16 fluid ounces	4 fluid ounces

**Wait at least 1 hour after Trouble Free treatment before entering pool** or follow the required waiting period for a product used with Trouble Free, if greater than 1 hour.

**[FOR POOLS USING POTASSIUM MONOPERSULFATE]**

Trouble Free is used to control and prevent algae growth and to maintain clear water in swimming pools using potassium monopersulfate as an activator.

**INITIAL TREATMENT** for pools using potassium monopersulfate to activate Trouble Free. Use to start a preventative treatment program with Trouble Free.

For each 10,000 gallons of water in pool, add 6 fluid ounces of Trouble Free directly to the water. To activate, add 1 pound of potassium monopersulfate per 10,000 gallons of water

Wait at least 1 hour after treatment before entering pool or follow the required waiting period for a product used with Trouble Free if greater than 1 hour.

**MAINTENANCE TREATMENT:** Use bi-weekly, or as needed to keep water free of algae. Separately add 6 oz. of Trouble Free and 1 pound of potassium monopersulfate per 10,000 gallons of water per week.

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Master Label with Additional Claims  
Suncoast Trouble Free

Wait at least 1 hour after treatment before entering pool or follow the required waiting period for a product used with Trouble Free if greater than 1 hour.

**WINTERIZING AND SPRING STARTUP TREATMENT**

1. Add 12 oz of Trouble Free per 10,000 gallons of water.
2. Activate by adding one of the following: 1 pound dry chlorinating compound (calcium hypochlorite or dichloroisocyanurate), 2 pounds lithium hypochlorite (35%), 1 gallon sodium hypochlorite (liquid chlorinating compound) 10-12%, 2 gallons sodium hypochlorite (liquid chlorinating compound) 5.25%, or 1 pound potassium monopersulfate per 10,000 gallons of water.
3. Allow the pump to circulate the water for several hours after chemical additions for good mixing.

Follow dealer's normal winterizing procedures for your pool. Before using a chlorinating compound or oxygen shock, read the Directions for Use and Precautionary Statements specific to that product. To aid in quicker and easier opening of the pool in the spring, repeat above application upon start-up.

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by the use, storage, or disposal of this product.

**STORAGE:** Store in original container. Store in a cool, dry place away from the reach of children. Keep container closed when not in use.

**DISPOSAL:**

**Pesticide Disposal:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use in accordance to label instructions, contact your Regional Office of the EPA for guidance.

**Container disposal:** Do not reuse container. Rinse thoroughly and securely wrap empty container in several layers of newspaper before discarding in trash.

**Warranty**

Seller makes no warranty expressed or implied concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when use and/or handling is contrary to label directions.

EPA Reg No. 46043-29  
EPA Est. No. 46043-FL-1

In Case of Emergency Call: 1-800-255-3924

**Manufactured By:**  
**Suncoast Chemicals Company**  
14480 62<sup>nd</sup> Street North  
Clearwater, FL 33760

Master Label with Additional Claims  
Suncoast Trouble Free

Optional Marketing Statements

Algaecide  
Prevents Algae Growth  
Removes Algae  
Controls Algae

For crystal clear water  
For sparkling water  
Keeps water clear  
Keeps water crystal clear  
Clarifies

Non-foaming  
Non-Staining

For Use in All Pools  
For Use in Vinyl Pools  
Ideal for all pool surfaces  
Safe for all pool surfaces

Removes and Prevents Yellow Algae On Any Type of Pool Surface  
Removes Yellow Algae  
Prevents Yellow Algae