

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

AUG 29 2011

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Kathy Kollen **EPA Regulatory Manager** Suncoast Chemicals Company 14480 62nd Street North Clearwater, FL 33760

Subject:

Trouble Free

EPA Registration No. 46043-29 Application Date: July 27, 2011 EPA Receipt Date: August 4, 2011

Dear Ms. Kollen:

The following notification submitted in connection with registration under the provisions of PR Notice 98-10, Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) section 3(c)9 is acceptable.

Proposed Notification:

Revised Container Disposal Section per PR Notice 2007-4

Comments:

Based on a review of the material submitted, the following comments apply:

This application for notification to revise the product label, as referenced above, is acceptable. A copy has been placed in our records for future reference.

Should you have any questions or comments concerning this letter, please contact me at harris.monisha@epa.gov or call (703) 308-0410.

Monisha Harris

Product Manager (32)

Regulatory Management Branch II SYMBOL

EPA Form 1320-1A (1/90)

Printed on Recycled Paper

OFFICIAL FILE COPY

Please read instructions on re-	verse before completing	g form.			Form Appr	oved.	OMB No. 20	70-0060	Print Form 2
Environme(al Protection Washington, DC 204			on Agency			Registration Amendment Other		OPP Identifier Number	
	A	pplicatio	n for	Pesticio	le - Sec	tion			
Company/Product Number Suncoast Chemicals Comp	any/46043-29			2. EPA P	roduct Man	ager		3. P	roposed Classification
4. Company/Product (Name) Suncoast Chemicals Co. / 1	rouble Free			PM# 32		1/1		7-	None Restricted
Suncoast Chemicals Com 14480 62nd Street North,	pany			(b)(i), m to: EPA R	eg. No	is simi		ical in co	n FIFRA Section 3(c)(3) omposition and labeling
			Sec	ction - I	ct Name	_			
Amendment - Explain by Resubmission in responsive Notification - Explain by Explanation: Use additional Notification to expand the	nse to Agency letter da slow. page(s) if necessary.	(For section			Agency lett "Me Too" / Other - Exp	ter date Applica Islain be	tion. low.		
			Sec	tion - II	1				
1. Material This Product Will E	le Packaged In:								
Yes* No * Certification must	Yes Yes No. per Certification must If "Yes" No. per		If "Ye	No Plan Gla If "Yes" No. per Pap			Metal Plastic Glass Paper	r Specify)	
3. Location of Net Contents In	formation 4.	. Size(s) Ret	ail Conta	ainer	1	5. Loc	On Label		ons
6. Manner in Which Label is A		Lithog Paper Stenci	raph glued		X Othe	-			
		Otonici	-	tion - I\	/				6666
1. Contact Point (Complete it	ems directly below for	identificatio	n of indi	vidual to be	contacted,	if nece	essary, to pr	ocess this	s application.)
Name Kathy Kollen			Title EPA Regulatory Manager				Telephone Nos (Include Area Code)		
I certify that the statem I acknowledge that any both under applicable is	knowingly false or mis	Certifica nis form and leading stat	all attac	hments the	ereto are tru shable by fir	e, accu ne or in	rate and comprisonment	nplete. or	6. Dete Application
2. Signature	lu		3. Title EPA Re	gulatory I	Manager				C C C C C C C C C C C C C C C C C C C

5. Date

July 27, 2011

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete.

4. Typed Name

Kathy Kollen

White - EPA File Copy (original)

Yellow - Applicant Copy



July 27, 2011

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

RE: Notification for Trouble Free EPA Reg. No. 46043-29 Suncoast Chemicals Company

Dear Sir or Madam:

Enclosed is a Notification request to add additional Storage and Disposal language on our Trouble Free label (as per PR Notice 2007-4) for Non-Household Use and Refillable Container instructions. These instructions are an expansion to the Nonrefillable Household/Residential Use instructions already approved by notification on April 15, 2009.

I have enclosed two (2) copies of our Trouble Free label, one of which is highlighted with the changes; a letter certifying no other changes have been made; and a completed EPA Application for Pesticide, marked "Notification.

Thank you for your assistance.

Sincerely,

Kathy Kollen

EPA Regulatory Manager

 $(x_1, x_2) \in \{X_1, x_2\} \cap \{x_3\}$

/Enclosures

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> P.O. Box 6025 Clearwater, FL 33758 14480 62nd St. N. Clearwater, FL 33760 Phone: (727) 531-8913 Fax: (727) 536-8066



CERTIFICATION For Trouble Free 46043-29

This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, 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.

Dated: July 27, 2011

Kathy Kollen

Suncoast Chemicals Company



Trouble Free

ALGAECIDE

NOTIFICATION
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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				
If On Skin or Clothing	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.			
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. Call a poison control center or doctor for treatment advice.			
If Swallowed	Call poison control center or doctor immediately for treatment advice.			
	HOTLINE NUMBER 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 5 gal.} This product is toxic to fish and aquatic organisms.

Suncoast Trouble Free 46043 - Notification to expand Storage & Disposal s on to include instructions for Non-Household and Refillable containers. 7/27/11

{For containers 5 gal. or greater} 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	cccc
1 gallon sodium hypochlorite (liquid chlorinating		
compound) 10-12%	5 fluid ounces	6 G G G
2 gallons of sodium hypochlorite (liquid		cc c
chlorinating compound) 5.25%	5 fluid ounces	С
1 lb of dry chlorinating compound (calcium		c c
hypochlorite or dichloroisocyanurate)	5 fluid ounces	0000
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	C (,

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Suncoast Trouble Free 460437 - Notification to expand Storage & Disposal storage on to include instructions for Non-Household and Refillable containers. 7/27/11

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. Too 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 pgoduct 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.

Suncoast Trouble Free 46043 - Notification to expand Storage & Disposal son to include instructions for Non-Household and Refillable Containers. 7/27/11

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

- 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 dichoroisocyanurate), 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.

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.

{For Nonrefillable Container – Household/Residential Use}

[Container disposal: Nonrefillable container. Do not reuse or refill this container. Rinse thoroughly and securely wrap empty container in several layers of newspaper before discarding in trash or offer for recycling, if available.]

{For Nonrefillable Container – Non-Household/Residential Use}

[Container disposal: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling, if available, or puncture and dispose of in any landfill or by incineration. Do not burn unless allowed by state and local ordinances.]

{For Refillable Container}

[Container disposal: Refillable container. Refill this container with sodium bromide only. Do not feuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or gipsate collection system. Repeat this procedure two more times, then offer for recycling, if available.

Suncoast Trouble Free 46043 - Notification to expand Storage & Disposal on to include instructions for Non-Household and Refillable containers. 7/27/11

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 62nd Street North Clearwater, FL 33760

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

