



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JAN - 9 2003

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Jonathan J. Bonelli
CNM Technologies
94 Gardiners Avenue, Suite 242
Levittown, N.Y. 11756

SUBJECT: October 22, 2002 Amendment
ChlorNoMore
EPA Registration 71146-2

Dear Mr. Bonelli:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the following conditions:

Delete "Statement of Practical Treatment" leaving only First Aid and make the heading the same type size as Environmental Hazard.

You must provide an Emergency Phone Number or eliminate that sentence.

Change "Inert" to "Other" Ingredients.

Your label must have all establishment numbers and indicate proper point of manufacture.

The marketing claim "ChlorNoMore instead of chlorine" is misleading since your product by itself is not a complete swimming pool treatment. You must delete this statement.

Two copies of the finished labeling must be submitted for the file. A copy of your conditionally approved label is enclosed. If you have any questions regarding this letter, please contact Tom Luminello of my staff at (703) 308-8075.

Sincerely yours,
for Tom Luminello
Robert S. Brennis
Product Manager (32)
Regulatory Management Branch II
Antimicrobial Division (7510-C)

Enclosure

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

DANGER. KEEP OUT OF REACH OF CHILDREN. Causes severe eye and skin irritation. Harmful if absorbed through the skin or inhaled. May cause skin sensitization reaction in certain individuals. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Protective clothing, including goggles, should be worn. Avoid contamination of food. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

STATEMENT OF PRACTICAL TREATMENT - FIRST AID *3 must be bigger*
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. Call a poison control center or doctor for treatment advice.
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 SWALLOWED: 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 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. Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional medical advice, call the following emergency phone number: 000-000-0000. *need phone number*

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. *delete or sentence*

ENVIRONMENTAL HAZARD

This pesticide 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 into sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

PESTICIDE STORAGE- Do not store on side. Avoid creasing or impacting of side walls. Store in securely closed original container. Avoid storage at temperature extremes or in sunlight. Use locked storage in an area that will prevent cross-contamination of other pesticides, fertilizer, food and feed. Store in locked area inaccessible to children.

PESTICIDE DISPOSAL Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or dilute 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.

Any unused orbs still in unopened container should be securely wrapped in several layers of newspaper and discarded in trash.

CONTAINER DISPOSAL - The outer box container is discarded in trash. The used orb is wrapped in several layers of newspaper and discarded in trash. Or if permitted, dispose of the recyclable orb into the plastics recycle bin.

**CHLOR NOMORE™
Brand**

A SWIMMING POOL ALGAECIDE

Change to "Other"

ACTIVE INGREDIENT:

Copper sulfate pentahydrate*.....99.0%
~~INERT INGREDIENTS..... 1.0%~~
TOTAL.....100.0%

* Metallic copper equivalent...25.2%

**KEEP OUT OF REACH OF CHILDREN
DANGER**

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

CNM TECHNOLOGIES, INC
94 GARDINERS AVENUE SUITE 242
LEVITTOWN, NY 11756

EPA Reg. No. 71146 - 2

EPA Est. No. *delete*

NET CONTENTS:

MARKETING CLAIMS

- Carefree instead of constant
- Cost less instead of more
- Advanced instead of outdated
- Odorless instead of offensive
- ~~ChlorNoMore instead of chlorine~~ *delete*
- Good for 90 days - Season supply
- New
- Once a season chlorine alternative
- Reduces chlorine usage up to 80%
- ChlorNoMore™ is a trademark of CNM Technologies, Inc
- ©1998 CNM Technologies, Inc. Patent pending
- We welcome your comments and success stories
- Designed for use in pools with vinyl liners only
- Good for one winter season supply
- Orb for all seasons
- Winter formula ionizing orb by the makers of ChlorNoMore™
- The easiest and fastest way to close your pool for the winter.

Must have establishment number

DIRECTIONS FOR USE

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

ALGAECIDE:

To be used in swimming pools to (kill algae) control green, blue-green and yellow algae. Remove filth such as leaves, branches and heavy algae growth.

SHOCK TREATMENT MAY BE NECESSARY BEFORE ORBS ARE USED.

Add 2 ounces per 5000 gallons of water. SEE (FOLLOW) CHART BELOW FOR CORRESPONDING ORB FOR POOL SIZE.

Remove orb from package. Place into skimmer basket (with filter running). Allow 8 hours before reentering (entering) pool. Maintain at 0.5-1.0 PPM of dissolved copper at all times with the use of a test kit. Use the higher rate when visible algae are present. For maintenance dosages, use the lower rate. Repeat the lower rate to control the recurrence of algae and to avoid the buildup of copper.

ONE ORB SHOULD LAST ONE SEASON - ABOUT THREE MONTHS. However factors such as water hardness, temperature, flow rate, amount of algae present, type of algae present may have an impact on the ppm level in the pool. Treated pool water must not be discharged where it will drain into lakes, streams, ponds or public water.

CHART FOR POOL SIZES: IONIZING ORBS - SUMMER

- 5,000 TO 10,000 GALLONS - 1 BLUE ORB (2 to 5 ounces)
- 10,000 TO 15,000 GALLONS - 1 GREEN ORB (5 to 8 ounces)
- 15,000 TO 20,000 GALLONS - 1 ORANGE ORB (8 to 10 ounces)
- 20,000 GALLONS & ABOVE - USE MULTIPLE ORBS PER CHART

CHART FOR POOL SIZES: WINTER IONIZING ORB

- 5,000 TO 20,000 GALLONS - 1 BLACK ORB
- Allow water to circulate for 3-12 hours before disconnecting the filter system. Make sure you have an established chlorine residual of 1-2 ppm before covering your pool. Remove empty orb from skimmer before covering your pool. This wintering ionizing orb treats all swimming pools up to 20,000 gallons.

Corresponding orb contains 2 ounces active chemistry per 5000 gallons of water.

Do not attempt to open orb. See poolcare manual enclosed for complete instructions & additional precautionary statements.

ACCEPTED
with COMMENTS
JAN - 9 2003

282