

777-97

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

SEP 7 2010

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Reckitt Benckiser, Inc.
Morris Corporate Center IV
399 Interpace Parkway
Parsippany, NJ 07054-0225

Attention: Liane Jenkins
Senior Regulatory & Registration Compliance Specialist

Subject: Twister II Notification for Minor Text Changes
EPA Reg. No. 777-97
Notification Letter Dated August 6, 2010
Application Dated August 6, 2010

Ms. Jenkins,

This will acknowledge receipt of your notification for the aforementioned product label, submitted under the provisions of Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Section 3© (9). Based on a review of the submitted material, the following apply:

The Agency approves the following minor changes to the current Master Label:

- The addition of two additional establishment numbers, 13891-IN-001 and 61209-MA-001;
- The insertion of the phrase, "For ingredient information, {insert website}";
- The insertion of the phrase, "Important: For directions for use and first aid instructions in Spanish, please call {insert phone number}";
- The insertion of the phrase, "Please recycle when empty";
- The addition of the six month claims, to appear on the label for only the first six months that product is on the shelf, "New fragrance", "New (and) (Improved)", "New {insert fragrance} scent", "New size";
- The addition of the words (Scent) or (Breeze) under the heading fragrance descriptors;
- The insertion of the Packaging Claims "Limited time (offer) (value) (bonus pack)", "Mega Value (pack) (size)", and "X% (Bonus) (more) (free)".

The Agency rejects the following minor changes to the current Master Label:

- The Agency rejects the insertion of the six month claim "(New) Ultimate Odor Eliminator" as this may imply heightened efficacy.

The Notification is in compliance with PR Notice 98-10 and is acceptable. This information has been made a part of your file.

If you have any questions concerning this letter, please contact Abigail Downs at (703) 305-5259.

Sincerely,



Marshall Swindell
Product Manager (33)
Regulatory Management Branch I
Antimicrobials Division (7510P)



United States
Environmental Protection Agency
 Washington, DC 20460

- Registration**
 Amendment
 Other

OPP Identifier Number
274443

Application for Pesticide - Section I

1. Company/Product Number 777-97	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Twister II	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Reckitt Benckiser Inc. Morris Corporate Center IV 399 Interpace Parkway Parsippany, NJ 07054-0225 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. 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

- Amendment - Explain below. Final printed labels in response to Agency letter dated _____
 Resubmission in response to Agency letter dated _____ "Me Too" Application
 Notification - Explain below. Other - Explain below

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

Notification to make minor changes to our current Master Label including:

Establishment Numbers, Company information, Spanish phone number, Recycling Statement, Scent indicators, Packaging claims and 6 months claims

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations 40 CFR 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 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:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	<input type="checkbox"/> Plastic
*Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container	<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container various		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product		<input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Liane Jenkins	Title Senior Regulatory & Registration Compliance Specialist	Telephone No. (Include Area Code) (973) 404-2781
Certification 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 or both under applicable law.		6. Date Application Received (Stamped)
2. Signature: 	3. Title: Senior Regulatory & Registration Compliance Specialist	
4. Typed Name: Liane Jenkins	5. Date: August 6, 2010	

August 6, 2010

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, 4th Floor
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501
ATT: Marshall Swindell, PM 33

RE: Twister II
EPA Registration No.: 777-97
Notification for Minor Text changes
OPP ID Number: 274443

Dear Marshall:

Reckitt Benckiser would like to submit some minor changes to the most recently approved Master Label.

The proposed additions are as follows:

- Establishment Number: 13891-IN-001
61209-MA-001
- Company Information: For ingredient information, {insert website}
- Spanish Phone Number: Important: For directions for use and first aid instructions in Spanish, please call {insert phone number}
- Recycling Statement: Please recycle when empty
- 6 Month Claims: New fragrance
New (and) (Improved)
New {insert fragrance name} scent
New size
(New) Ultimate Odor Eliminator
- Scent Indicator: adding (Scent) (Breeze) after scent name
- Packaging Claims: Limited time (offer) (value) (bonus (pack)
Mega Value (pack) (size)
X% (Bonus) (more) (free)

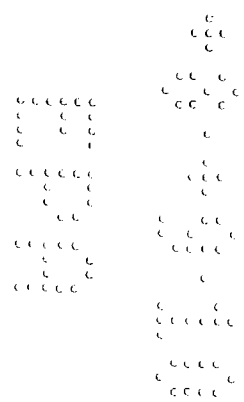
In order to support this submission, the following documentation is included:

- EPA Form 8570-1, OPP Identification No. 274443
- One (1) Copy of the draft master label with the changes incorporated

If you have any questions or need anything else, please contact me at (973) 404-2781 (office) or email at liane.jenkins@rb.com.

Sincerely,

Liane Jenkins
Senior Regulatory & Registration
Compliance Specialist



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<< Front Panel >>

ACTIVE INGREDIENTS:

Triethylene Glycol 5.40%

OTHER INGREDIENTS: 94.60%

TOTAL: 100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION: See back (side) panel for additional precautionary statements.

- NET WT.: 0.5 OZ. (14 g)
- 1.5 OZ. (42 g)
- 10 OZ. (283 g)
- 12 OZ. (340 g)
- 15 OZ. (425 g)
- 16 OZ. (1 LB.) (453 g)
- 18 OZ. (1 LB. 2 OZ.) (510 g)
- 19 OZ. (1 LB. 3 OZ.) (538 g)

<< Front or Back Panel >>

EPA Reg. No.: 777-97
 EPA Est. No.: 777-NJ-2
13891-IN-001
61203-MA-001

See bottom or side (for Lot/Date code)
 Federal regulations prohibit CFC propellants in aerosols.
 Graphic Symbol (Contains no CFCs or other ozone depleting substances)

<< Back Panel >>

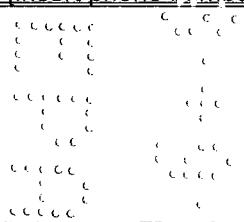
Questions? (symbol of phone) (1-800-228-4722)
For ingredient information, {insert website}

Distributed by: Reckitt Benckiser Inc., Parsippany, NJ 07054(-xxxx)
 Made in U.S.A. © RBI {insert year}

<< Back Panel – Optional text >>

Steel Recycling Symbol
Please recycle when empty
 This can is made from an average of (xx)% recycled steel (xx% post-consumer).
 Encourage your local authorities to establish a program to recycle this (can) (container).
Important: For directions for use and first aid instructions in Spanish, please call {insert phone number}

(Licensed under) U.S. Patent Number 5,795,566



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<< Front or Back Panel - Marketing / Product Performance claims – use as bullet point or in paragraph format >>

<< INTRODUCTORY 6-MONTH CLAIMS – will appear on the graphics label for 6 months the product is on shelf >>

- New fragrance
- New (and) (Improved)
- New {insert fragrance name} scent
- New size
- (New) Ultimate Odor Eliminator

<< **PRODUCT DESCRIPTORS** >>

- Air Treatment
- Air Cleaner
- Air Sweeper
- Air Sanitizer

- Odor Eliminator
- Odor Remover
- Odor Destroyer
- Odor Buster
- Odor Sweeper

<< **FRAGRANCE DESCRIPTORS** >>

- | | | |
|--|------------------------------------|--|
| <u>Blue Sky (Scent) (Breeze)</u> | <u>Clear Blue (Scent) (Breeze)</u> | <u>Ocean Mist (Scent) (Breeze)</u> |
| <u>Blue Breeze (Scent)</u> | <u>Crisp Air (Scent) (Breeze)</u> | <u>Pure Air (Scent) (Breeze)</u> |
| <u>Blue Sky Water (Scent) (Breeze)</u> | <u>Cool Air (Scent) (Breeze)</u> | <u>Pure Breeze (Scent) (Breeze)</u> |
| <u>Citrus Essence (Scent) (Breeze)</u> | <u>Crystal Breeze (Scent)</u> | <u>Sea Breeze (Scent) (Breeze)</u> |
| <u>Citrus (Scent) (Breeze)</u> | <u>Fragrance Free</u> | <u>Sky Fresh (Scent) (Breeze)</u> |
| <u>Citrus Grove (Scent) (Breeze)</u> | <u>Fresh Air (Scent) (Breeze)</u> | <u>Sparkling Water(s) (Scent) (Breeze)</u> |
| <u>Citrus Fresh (Scent) (Breeze)</u> | <u>Fresh Breeze (Scent)</u> | <u>Spring (Scent) (Breeze)</u> |
| <u>Citrus Field (Scent) (Breeze)</u> | <u>Ocean Breeze (Scent)</u> | <u>Spring Water(s) (Scent) (Breeze)</u> |
| <u>Citrus Tree (Scent) (Breeze)</u> | | |

(Fresh) (Pleasant) {insert fragrance descriptor} (Scent) (Breeze) (Essence) (Fresh)

<< **PACKAGING CLAIMS** >>

- | | |
|--|---|
| Better Value | Personal Size |
| Bonus Pack | Purse Size |
| Club (Pack) (Size) | Save Money By Buying Our Convenient Club Pack Size! |
| Convenient Size | Special Pack |
| Discreet Size | Travel Pack (Size) |
| Economy Size | Trial Size |
| <u>Limited time (offer) (value) (bonus) (pack)</u> | <u>Value(Pack) (size)</u> |
| <u>Mega Value (pack) (size)</u> | <u>X% (Bonus) (more) (free)</u> |
| Multi-Pack | |

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<< FRAGRANCE RELATED CLAIMS >>

Air so (clean) (clear) (pure) (fresh) (refreshed) you (can) (will) (immediately) (instantly) (smell) (notice) (welcome) (distinguish) (appreciate) the (freshness) (improvement) (difference).
(Simply) Air so clean you can smell the freshness
(Unlike) (some) (regular) (ordinary) (Air Fresheners,) there is no overpowering (smell) (fragrance) (scent)
(This product) Leaves (behind) a (fresh) (light) (clean) (refreshing) (scent) (fragrance) (smell) (in) (the) (your) (air) (home)
(This product) Eliminates odors (with no) (without a(n)) (heavy) (overpowering) (strong) (floral) fragrance
(This product) Leaves (no odors behind) (an odor free room)
(This product) Makes your home a fresher place to be.

<< BRAND CLAIMS >>

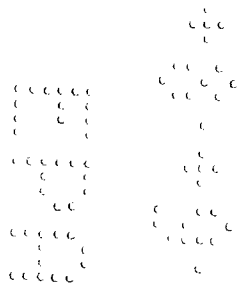
(And) Because it's from (the makers of) Lysol, you can trust it (to) (work) (remove) (destroy) (eliminate) (odors caused by bacteria in the air) (odors caused by airborne bacteria)
Because it's from (the makers of) Lysol, you can trust it (to temporarily reduce airborne bacteria) (to temporarily reduce bacteria in the air).
Helps protect your family from odor causing bacteria with this product
(Life Stinks:) (Neutra Air) (this product) (your odors) (it)
(This product) (is) from the makers of Lysol (brand products)

<< FORMULATION CLAIMS >>

(This product's) Formula binds to and then chemically reacts with odor molecules (in mid-air) (in the air) to neutralize them and effectively make them odorless.
This product contains (advanced) (patented technology) (breakthrough) (odor-eliminating) (ingredients) (that work in the air) (to) (eliminate) (remove) (destroy) (temporarily reduce) (odors) (in the air) (leaving) (the air) (smelling) (clean) (fresh)
(This product) (Works) (Patented technology) (combines with) (attacks) the odors to eliminate (it) (them) (from the air)

<< USE SITE CLAIMS >>

Great for bathrooms!
(This product) can be used (in) (around) {insert USE SITES from list below}
Use (this product) to temporarily reduce (the number of)(odor-causing bacteria) in your {insert USE SITES from list below}
Use (this product) to eliminate (destroy) (take away) (sweep away) (tough) (odors) in your {insert USE SITES from list below}
Spray may leave hard floors slippery. Do not concentrate spray over hard floors.



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<< AIR SANITIZING CLAIMS >>

It takes more than fresh air to clean your (home) (air) from (odor(s)) (odor-causing bacteria) (airborne bacteria)
(This product) (Cleans) (Sanitizes) the air (you breathe) (from odor-causing bacteria)
(This product) (Cleans) (Sanitizes) the air by (temporarily reducing) (odor-causing) (bacteria) (airborne bacteria)
(from) (in) (the air)
(This product) refreshes the air
Sanitizes the air (you breathe) (in your home)

<< ODOR REMOVAL CLAIMS >>

Cleans (cleanses) (your air of odors) (the air you breathe)
Clean the air with (this product)
Eliminate bacterial odors at the source (with this product)
Eliminates odors caused by bacteria
Eliminates (odors) {insert ODORS from list below} (caused by bacteria)
Eliminated (odors) {insert ODORS from list below} unlike air fresheners (that) (which) only mask odors
(temporarily).
Eliminates (tough) (problem) odors (around){such as} {insert ODORS from list below} {insert list of
ROOMS from list below}
Eliminates odors unlike air fresheners that only mask odors temporarily.
Eradicate odors.
Get odors out with (this product)
Kills (eliminates) (reduces) (controls) {list of ODORS from list} (odors) caused by (airborne) bacteria.
Leaves no odors behind
Odor (eliminator) (elimination) Solve odor problems at the source (with this product)
(This product) cleans the air we breathe
(This product) doesn't just (mask) (disguise) (cover up) odors, (it eliminates them).
(This products) (Eliminates) (Destroys) odors (caused by bacteria)
(This product) eliminates odors by (removing)(killing) (controlling) odor causing bacteria (in the air)
(This product) (eliminates) (gets rid of) the (odors) (smells) (stinks) without just masking them.
(This product) is effective (against) (in) (eliminating) (removing) (destroying) (tough) {insert ODORS
from list below}
Unlike air fresheners, which only mask odors temporarily, (this product) eliminates {insert ODORS
from list below}.
Unlike (other) (ordinary) (regular) air fresheners that (only) mask odors (temporarily), (this product) eliminates
tough odors, such as {insert ODORS from list below}
(With this product) (You can) (be sure) (be confident) (that) (even) (tough) (lingering) (odors) (are not just
masked) (but) (are) (actually) (eliminated) (removed).
Works to eliminates odors.

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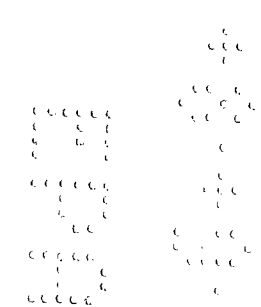
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<< BACTERIA CLAIMS >>

Clean (cleanse) your air of bacteria and their (bad) (odors) (smells) (stinks)
Keeps odors away by (seeking out and) (destroying) (removing) (killing) (eliminating) (reducing)
(controlling) odor-causing bacteria in the air.
Keeps (on) (killing) (destroying) (eliminating) (reducing) (Removing) (controlling) odor-causing
bacteria in the air.
(Kills) (destroys) (controls) (eliminates) (reduces) (Removes) (seeks out) odor causing bacteria (and
eliminates their odors)
(This product) (controls) (kills) (eliminates) (destroys) odor-causing airborne bacteria (and eliminates
their odors).
(This product) (controls) (kills) (eliminates) (destroys) odor-causing bacteria in the air (and eliminates
their odors).
(This product) (controls) (kills) (eliminates) (destroys) airborne odor-causing bacteria (and eliminates
their odors).
(This product) eliminates odors in the air by (killing) (controls) (reduces) (destroying) (eliminating)
odor-causing airborne bacteria
(This product) (kills) (destroys) (controls) (reduces) (eliminates) (Removes) (seeks out) odor causing
bacteria in the air (and eliminates their odors)
(This product) (kills) (controls) (destroys) (eliminates) (reduces) (Removes) (seeks out) odor causing
airborne bacteria (and eliminates their odors)
(This product) (kills) (destroys) (controls) (eliminates) (reduces) (Removes) (seeks out) odor-causing
bacteria in the air – unlike air fresheners, which only mask odors.
(This product)) (kills) (destroys) (eliminates) (reduces) (Removes) (seeks out) (controls) the bacteria
that cause (bad)(tough) {insert ODORS from list below} (in the air)
(This product) (kills)(controls) (Eliminates) (Removes) (Destroys) (Reduces) odors caused by
(airborne bacteria) (bacteria in the air) (such as) (around) {insert ODORS from list below}
(This product) (kills) (controls) (Eliminates) (Removes) (Destroys) (reduces) (bacterial odors) (non-
bacterial odors) (such as) (around) {insert ODORS from list below}

<< TEMPORARILY ACTION CLAIMS >>

Temporarily reduced odor-causing (airborne) bacteria in the air
(This product) (Helps) (temporarily reduce) the number of airborne odor causing bacteria in virtually any room
(to leave your home smelling clean and fresh)
(This product) (Helps) (temporarily reduce) the number of airborne bacteria (in any room) {insert ROOM from list
below}
(This product) Temporarily Reduces (odor causing) inanimate airborne contaminants
(This products) temporarily reduces (Removes) (Sweeps away) (Takes away) (airborne bacteria) (bacteria in
the air) (odor causing bacteria in the air)
(Use) (With) (This product) (helps) Temporarily reduce (the number of) (airborne bacteria) (bacteria in the air)
(contaminants) (in your home) (in virtually any room) (by) (eliminating odors) (removing) (destroying odors)
(sweeping away) (odors) (temporarily reducing airborne bacteria) (temporarily reducing odor causing
bacteria) (in the air) (leaving) (to leave) (your home) (behind) (smelling) (a) (clean) (fresh) (pure) (light)
(crisp) (fragrance) (scent)



NOTE: Bracketed information is denoted as: << directive >>, { insert as noted }, (optional text), [required qualifier]. The term "this product" used throughout this document may be replaced with the marketed product brand name. The word "and" and punctuation may be inserted in any performance claim for grammatical purposes. Verb tense for any performance claim can be changed for grammatical purposes



<< Back Panel - Use directions >>

DIRECTIONS FOR USE:

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

Shake well before each use. To temporarily reduce airborne odor-causing bacteria and eliminate odors, close all doors, windows, and air vents. Hold can upright, press button and spray towards the center of an average size room (12' x 12' x 9') for 10 seconds. For maximum effectiveness, relative humidity should be between 45% and 70%. Resume normal room ventilation after spray has settled. Repeat as necessary.

<< Back Panel >>

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

CAUTION: Do not spray directly in eyes.

FIRST AID	
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.
CONTACT NUMBER	
Questions? Comments or In case of an emergency, call toll free 1-800-228-4722. Have the product container or label with you when calling a Poison Control Center, or doctor, or going for treatment.	

<< Storage and Disposal language >>

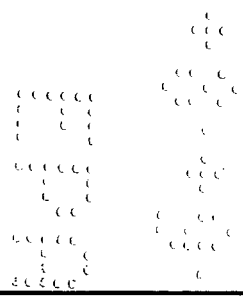
STORAGE AND DISPOSAL:

Store in original container in areas inaccessible to small children. Do not reuse empty container. Do not puncture or incinerate. (Replace cap and) Discard in trash.

<< Physical Hazards language >>

PHYSICAL HAZARDS:

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.



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