

777-104

9/9/2014

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

SEP 9 2014

OFFICE OF  
CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Keshia Carswell, Esq.  
Reckitt Benckiser LLC.D/B/A Reckitt Benckiser  
Morris Corporate Center IV  
399 Interpace Parkway  
Parsippany, NJ 07054-0225

**Subject: Vanity GP**  
**EPA Registration Number:** 777-104  
**Application Date:** August 21, 2014  
**Receipt Date:** August 22, 2014

Dear Ms. Carswell:

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

**Proposed Notification:**

Reckitt Benckiser LLC, has submitted a notification to add following establishment numbers to the master label:

777-PA-001  
Update 8791-MO-001 to 777-MO-001 (St. Peters, MO facility)

Based on a review of the material submitted, the following comment applies: your notification to update as referenced above is acceptable and a copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at [campbell.jacqueline@epa.gov](mailto:campbell.jacqueline@epa.gov) or Terria Northern by telephone at (703) 347-0265 or by e-mail at [northern.terria@epa.gov](mailto:northern.terria@epa.gov) during the hours of 8:00am to 4:00pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

A handwritten signature in black ink, appearing to read "Jacqueline Hardy".

Jacqueline Hardy  
Product Manager (34)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

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

1. Company/Product Number 777-104	2. EPA Product Manager Mr. Demson Fuller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
Company/Product (Name) Vanity GP	PM# # 32	
5. Name and Address of Applicant (Include ZIP Code) Reckitt Benckiser LLC, D/B/A Reckitt Benckiser Morris Corporate Center IV 399 Interpace Parkway Parsippany, NJ 07054-0225 <input type="checkbox"/> Check if this is a new address	6. <b>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.)

Updated EPA establishment numbers on page one of the master label:

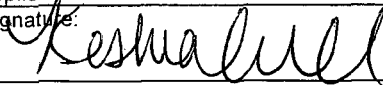
- Added 777-PA-001
- Updated 8791-MO-001 to 777-MO-001

This non-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 non-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 type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
*Certification must be submitted (on file)		If "Yes" Unit Packaging wgt.    No. per container	If "Yes" Package wgt.    No. per container		
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 type="checkbox"/> Lithograph <input checked="" 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)		
Name Keshia Carswell, Esq.	Title Regulatory Operations Lead	Telephone No. (Include Area Code) 973-404-2995
<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 or both under applicable law.		6. Date Application Received: <b>(Stamped)</b>
Signature: 		
Title: Regulatory Operations Lead		
Typed Name: Keshia Carswell, Esq.		Date: August 21, 2014



<< FRONT PANEL >>

ACTIVE INGREDIENT:

Hydrochloric Acid ..... 12.0%

OTHER INGREDIENTS: ..... 88.0%

TOTAL: ..... 100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER: CORROSIVE.

See (back) (side) panel for additional precautionary statements and first aid. Harmful if swallowed.

NET CONTENTS: 16 FL. OZ. (1 PT.) 473 mL  
24 FL. OZ. (1 PT. 8 FL. OZ.) 709 mL  
32 FL. OZ. (1 QT.) 946 mL

(2) 24 FL. OZ. (1 PT. 8 FL. OZ.) 709 mL TOTAL: 48 FL. OZ., (1 QT. 1 PT.) 1.41 L  
(3) 24 FL. OZ. (1 PT. 8 FL. OZ.) 709 mL TOTAL: 72 FL. OZ. (2 QTS. 8 FL. OZ.) 2.12 L  
(3) 32 FL. OZ. (1 QT.) 946 mL TOTAL: 96 FL. OZ. (3 QTS.) 2.83 L  
(4) 32 FL. OZ. (1 QT.) 946 mL TOTAL: 128 FL. OZ. (1 GAL.) 3.78 L  
(6) 32 FL. OZ. (1 QT.) 946 mL TOTAL: 192 FL. OZ. (1.5 GAL.) 5.67 L

<< FRONT / BACK PANEL >>

EPA Reg. No.: 777-104  
EPA Est. No.: 777-NJ-2 777-MO-001 075371-IN-003 777-PA-001  
(See bottom or side) (for Lot / Date code)

<< BACK PANEL >>

Questions? (C) (Call:) (1-800-228-4722) (1-800-677-9218)  
For ingredient (and other) information, (www.rbnainfo.com) (website)  
Distributed by: Reckitt Benckiser, Parsippany, NJ 07054 (-xxxx)  
Made in U.S.A. © {year} RB  
Contains no phosphates.  
This (bottle) (container) is made of 25% post-consumer recycled plastic.



Company graphic logo

<< FRONT / BACK PANEL – Option text >>



Limited Quantity Transportation Symbol

Important facts (about this product)

Encourage your state and local authorities to establish a program to recycle this (bottle) (container).

IMPORTANT: For directions for use and first aid instructions in Spanish, please call 1-877-843-3817.

<< Spanish Translation >>

IMPORTANTE: Para instrucciones de uso y primeros auxilios en español por favor llame al 1-877-843-3817.

Learn more about (the importance of good hygiene habits) (and the many ways that Lysol® is promoting good hygiene habits) (for your family and community), go to www.spreadinghealth.com.

QR Code:



(Use your phone to) (and) (or) (scan) (the) (tag) (or) (this code) (to learn) (or) (to) (see) (more) (uses) (or) (information) (videos) (on how to use) (this product) (for) (how to) (tips) (Snap this code to get informed)

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.  
To use the term "germ\*" the product must be efficacious against 2 of the 3 major classes of organisms.  
The product label must identify the specific bacteria\*, virus\*, fungus\* & mold\*.  
The term ( x ) is a placeholder that represents a number between 1 and 99.

<< NOTE: Any claim may appear on FRONT / BACK panel in bullet / paragraph format – Unless otherwise noted. >>

<< INTRODUCTORY 6-mos. CLAIMS – will only appear on graphic label for the first 6 months product is on shelf >>

(New) (Improved) (Formula) (Angle neck bottle) (Cap) (Fragrance) (Pack) (Package) (Scent) (Size)  
(Better) (Improved) (Stain Removal) (Rust Removal) (Lime Scale Removal) (Bowl coverage than before)  
Better hard water stain – dissolving power {(than before) (than previous formula) (than prior formula)}  
Better hard water stain removal {(than before) (than previous formula) (than prior formula)}  
Dissolves hard water stains better {(than before) (than previous formula) (than prior formula)}  
(Improved) (Bowl) (Coverage) than (other) Lysol® Brand Disinfectant {(Liquid Bleach) (APC(s)) (TBC(s))}  
(Improved) {insert soils from list on pg. 8} removal  
(New) (Improved) (Formula) contains (cleaning) (cleaning power) (agents) (stain fighters)  
(New) (Improved) (Formula) with (stain fighting agents) (with stain fighting action)  
Thick liquid coats bowl for better cleaning than prior formula

<< PACKAGING CLAIMS >>

(2 PACK) (3 PACK) (4 PACK) (6 PACK) (x PACK) (Family) (Household) (Multi-Room) (Pack)  
(x Uses per pack) (x Uses per bottle) (Cleans x toilets) (x Uses)  
(Multi-Toilet Pack) (Value Pack) (Limited Time Value Pack) (Limited Time Value) (One for each bathroom)  
(Place 1 in each bathroom) (Buy x get x free) (x% discount) (x% more free) (x% more product) (25% More Product)  
(Great) (Bonus) (Economy) (Value) (Trial) (Pack) (Size) (Mega Value Pack) (Mega Value Size)  
(2 for 1 Pack) (2 in 1 Pack) (32 oz. for the price of 16 oz.) (\_\_\_ x \_\_\_ FL. OZ.) (x oz. at the price of x oz.)  
(2 x 24 FL. OZ.) (3 x 24 FL. OZ.) (4 x 32 FL. OZ.) (6 x 32 FL. OZ.)  
Save \$x (by mail) (when you buy Lysol® Toilet Bowl Cleaner)  
(Bonus x%) (x% Free) (x oz. for Free) (x oz. for the price of x oz.)  
(Bonus 50%) (50% Free) (16 oz. for Free) (32 oz. for the price of 16 oz.)  
(Bonus 33%) (33% Free) (8 oz. for Free) (32 oz. for the price of 24 oz.) (24 oz. for the price of 16 oz.)

Best value bottle  
Buy me again  
Click & Close (Indicator)  
Click stop – audible close  
Contains up to x uses  
Convenient cap  
Easy grip bottle  
Easy to close  
Easy to reach under the rim  
(Easy) (Easier) to (open) (squeeze) cap  
Easy to use (bottle)  
Entire bottle can be recycled  
Ergonomic bottle grip  
Helps reach under the rim  
Leak-proof cap  
Long (angle) neck bottle (reaches under the rim)  
No slip grip  
Non-drip  
Non-removable cap  
Open / Close indicator in contrasting colors – let's you know if the bottle is open / closed  
Removable cap  
(Repurchase time) (Shopping time) (Time to replace) (Time to buy a new Lysol® toilet bowl cleaner)  
(Senior friendly cap) (Senior tested cap)  
Specially designed angle neck – gets all the way up under the rim  
(Specially) designed (cap) for better (bowl) coverage  
Specially designed neck makes it easy to clean under the rim  
Twist and go cap  
(Unique) Angle neck bottle (for hard to reach areas) (reaches under the rim)

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<< MARKETING CLAIMS >>

(Antibacterial) (Antibacterial Action) (Antimicrobial) (Antiviral) (Bactericidal) (Bactericide) (Disinfectant) (Disinfects) (Germicidal\*\*) (Sanitizer) (Sanitizes) (Virucidal†)

(Completely) (Easily) (Effectively) (Quickly) (Thoroughly) (Cleans) (Shines) (Whitens) (Deodorizes) (Fast / Easy / Effective) (Toilet Bowl Cleaner) (Toilet Bowl Disinfectant)

(Clean) (Fragrance) (Fresh) (Minty) (Pleasant) (Spearmint) (Wintergreen) (Scent)

(Deep cleaning) (Bowl & Beyond) (Easy to use) (Non-abrasive) (Rust destroying) (Thick) (Tough stain) (Formula) (Breaks down) (Cleans) (Cleans away) (Destroys) (Dissolves) (Easily) (Penetrates) (Quickly) (Removes) (Stubborn) (Tough) (Hard Water) (Lime Scale) (Mineral) (Rust) (Stains) (Deposits) (Toilet Rings) (Lime & Rust Remover) (Lime Scale Remover) (Lime Scale & Rust Remover)

(Maximum coverage) (Powerful cleaning) (Maximum bowl coverage) (Improved coverage)

(Maximum) (Max) (Bowl) (Coverage) (Powerful) (Clean) (Cleaning action)

(Maximum) (Power) (Protection) (Strength) (Cleaner) (Cleaning)

(5X) (the) (Cleaning Power)

Dual Action Toilet Bowl Cleaner

2-in-1: Cleans, Disinfects

Triple Action: Cleans, Disinfects, Deodorizes

3-in-1 (Formula): (Cleans, Disinfects, Deodorizes) (Cleans, Disinfects, Refreshens) (Cleans, Disinfects, Removes Stains)

4-in-1: Cleans, Disinfects, Deodorizes, Sanitizes

(6)(six)(-in-)(in)(1)(one)

6X (Cleaning)(Power)(Action)

5X Power\* (\*This product has 5X Power to remove organic soil, (remove) limescale, remove rust stains, refresh, and deodorize)

6 in 1\* (\*This product has 6 in 1 action to remove organic soil, (remove) tough stains like limescale & rust, disinfect, sanitize, refresh, and deodorize)

Accepted for hospital disinfection

Better reach under the rim

Coats the entire bowl

Complete Clean

Confidence of Lysol®

Depend-a-bowl toilet bowl cleaner

Gives your bowl the Lysol® clean you trust

Go beyond clean

Great for everyday (cleaning) (deodorizing) (disinfecting) (and) (&) (sanitizing)

(Home) (Hospital) disinfectant toilet bowl cleaner

Hospital disinfectant

Hospital toilet bowl cleaner

Keep your toilet looking new

Meets AOAC Use-dilution Efficacy test standards for hospital disinfectant toilet bowl cleaners

Quality household disinfection

Quick and easy

The clean you trust

The confidence you get from the Lysol® name

The right tool for a nasty job

Trusted toilet disinfection

Use in conjunction with other Lysol® products for a clean bathroom

Efficacy tests have demonstrated that (this product) is effective as a one-step toilet bowl cleaner and disinfectant in the presence of organic soil (5% blood serum).

(This product) has a thick formula that coats above and below the waterline. This coating action provides longer contact time to help dissolve tough rust stains and mineral deposits (on contact) to make cleaning easier.

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This product contains no phosphates and is germicidal when used as directed but differs in composition from other Lysol® Brand products.

<< PERFORMANCE CLAIMS >>

- (x%) more lime scale removal
- X% Stronger on hard water stains††† [ ††† vs. (Lysol® Power Toilet Bowl Cleaner) (Lysol® Cling Toilet Bowl Cleaner) ]
- (Advanced) (Deep) Cleaning Power
- Clings to the bowl to stay where the germs are
- Coating action above and below the waterline provides extended contact time.
- Coats the bowl above and below the waterline
- Coats the bowl to stay in contact longer
- Coats the bowl to stay where the germs are
- Designed to (remove) (penetrate) (destroy) (dissolve) tough (stubborn) {insert soils from list on pg. 8}
- Designed to (remove) (penetrate) (destroy) (dissolve) the toughest {insert soils from list on pg. 8}
- Destroys hard water stains
- Destroys hard water stains immediately
- Does not just whiten (insert soils from list on pg. 8) stains, (this product) removes them
- Easily dissolves stubborn hard water stains
- Easily removes hard water stains
- Eliminates hard water stains
- Eliminates hard water stains in seconds
- Fast action on hard water stains
- Formulated especially for hard water mineral deposits, lime scale and rust
- Hard water formulation
- Helps keep water flow optimal
- Instantly dissolves hard water stains
- Leaves toilet sparkling clean and disinfected
- No hard scrubbing
- Powers through hard water stains
- (Provides)(20)(twenty)(%)(percent) more removal of limescale (vs)(v)(versus) (Lysol® Power Toilet Bowl Cleaner)
- (Removes)(cleans)(soil)(limescale)(and)(rust)
- Removes (x%) of hard water stains
- Rinses away easily
- Specially designed for hard water problems
- Specially designed for hard water (stains) (areas)
- Specially designed for the removal of rust and (&) lime scale stains
- Specially designed for the removal of rust stains and mineral deposits
- Specially designed to breakdown rust and (&) lime scale stains
- Specially designed to breakdown stains and mineral deposits
- Specially designed to clean the toilet
- Specially designed to (remove) (penetrate) (destroy) (dissolve) the toughest {insert soils from list on pg. 8}
- Specially designed to (remove) (penetrate) (destroy) (dissolve) tough (stubborn) {insert soils from list on pg. 8}
- Specially formulated to (remove) (penetrate) (destroy) (eliminate) {insert soils from list on pg. 8}
- Special rust formula makes stain and mineral deposits easy to remove
- Thick clinging action
- Thick coating formula for prolonged contact time
- Thick formula adheres to stains for better cleaning
- Thick formula coats above and (&) below the waterline
- Thick formula coats the entire bowl
- Thick formula that cleans, deodorizes, disinfects and sanitizes
- Thick liquid coats bowl for better cleaning
- Thick liquid sticks to stains
- Toilet bowl cleaner with lime and (&) rust remover
- Whitens and brightens toilet bowl
- (Won't) (Will not) stain the bowl
- Works best in hard water areas
- Works best on hard water stains

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<< USAGE CLAIMS >>

A great toilet bowl disinfectant and sanitizer for use in {insert site from list on pg. 8}  
 An effective (disinfectant) (&) (sanitizer) for use in {insert surface from list on pg. 8}  
 Can be used in white and colored bowls  
 For better results use at least (once) (twice) a week  
 For use as a toilet bowl (cleaner) (deodorizer) (disinfectant) (&) (sanitizer) found in {insert site from list on pg. 8}  
 (Intended) For use (only) in {insert site from list on pg. 8}  
 For use in {insert surface from list on pg. 8} as a cleaner, disinfectant (and) (&) sanitizer found in {insert site from list on pg. 8}  
 Good on American and European toilets  
 Great for use as a toilet bowl (cleaner) (deodorizer) (disinfectant) (and) (&) (sanitizer) in {insert site from list on pg. 8}  
 For use in {insert site from list on pg. 8}  
 Usage: twice daily to maintain a clean toilet  
 (This product) is for use in {insert surface from list on pg. 8}

<< NOTE: ALL SUPPORTING CLAIM QUALIFIERS – must appear before 'Directions For Use' on Back Panel label >>

<< CLEANING / DEODORIZING CLAIMS >>

X% (more) (cleaning ingredients) (lime scale removal) (removal of lime scale) (rust removal)†††  
 [ ††† vs. (Lysol® Power Toilet Bowl Cleaner) (Lysol® Cling Toilet Bowl Cleaner) ]  
 3X Cleaning Power  
 3X (the) Cleaning Power on {insert soils from list on page 8}  
 (This product) has 3X Cleaning Power to remove {insert soils from list on page 8}  
 All the power you need to clean your toilet bowl  
 An efficient way to clean your bowl  
 Begins to destroy {insert soils from list on page 8} instantly  
 Breaks down stains without brushing or scrubbing  
 Brightens as it cleans  
 Cleans above and below the waterline  
 Cleans above, below and beyond the waterline  
 Cleans and disinfects above and below the waterline  
 Cleans as it disinfects  
 Cleans away everyday dirt and grime  
 Cleans to a shiny finish  
 Contains Hydrogen Chloride to remove rust and lime scale  
 Controls odors at their source  
 Controls odors caused by bacteria  
 Controls toilet odors caused by bacteria  
 Deep Down Clean  
 Deodorizes by killing bacteria that cause odors  
 Deodorizes with a fresh, clean scent  
 Designed to clean under the rim  
 Destroys hard water stains (on contact)  
 Destroys {insert soils from list on page 8} on impact  
 (Destroys) (Dissolves) toilet bowl rings  
 Destroys tough stains  
 Destroys (tough) (the toughest) (insert soils from list on page 8)  
 (Dissolves) (Destroys) (Removes) stains right before your eyes  
 Dissolves the toughest hard water deposits  
 Dissolves tough rust stains and mineral deposits (but will not harm porcelain)  
 Dissolves tough rust and mineral stains (but will not harm porcelain)  
 Easily breaks down stains without (heavy) (hard) brushing or scrubbing  
 Easy under-the-rim cleaning  
 (Eliminates) (Controls) (Kills) the bacteria that cause (bad) (unpleasant) odors (at the source)  
 Eliminates odors at their source caused by bacteria  
 Eliminates odors caused by bacteria  
 (Even) The tough(est) {insert soils from list on page 8} (start to) disappear right before your eyes

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Extra strength cleaner  
 Fast acting formula  
 Fast-acting toilet bowl cleaner  
 For a (bright) (shiny) (white) (clean) toilet bowl  
 For a super-clean toilet  
 For a thoroughly clean toilet bowl surface  
 For an absolutely clean toilet bowl surface  
 For an ultra-clean toilet  
 For hard water (stains) (areas)  
 Frequent use prevents rust build-up (lime scale) (mineral stains)  
 Hard water cleaning formula  
 Hard water cleaner  
 Heavy-duty cleaner  
 Heavy-duty cleaning (formula)  
 (Helps) (Remove(s) Toilet Rings)  
 Helps to destroy odors

<< CLEANING / DEODORIZING CLAIMS - continued >>

Instant action cleaner  
 Kills odors  
 Kills the bacteria that cause bad odors  
 Leaves bowl disinfected, clean and shiny  
 Leaves (your) toilet bowl sanitary  
 Lime scale remover  
 Lime (scale) & rust remover  
 Make your bowl look like you clean it everyday (even though you don't)  
 Maximum (cleaning power) (stain fighting power)  
 Maximum stain fighting (power) (and complete disinfection)  
 Maximum power [(cleaner) (cleaning)]  
 Mineral dissolving action  
 (Penetrates) (Dissolves) (Removes) (Destroys) even the toughest {insert soils from list on page 8}  
 (Penetrates) (Loosens) (Eliminates) (tough) stains (like) (insert soils from list on page 8)  
 Powerful cleaner for the toilet bowl  
 Powerful cleaning (formula)  
 Powerful cleaning formula dissolves tough stains  
 Powerful stain (fighting) (fighter)  
 Powers out {insert soils from list on page 8}  
 Powers through (thru) hard water stains  
 Prevents the build-up of {insert soils from list on page 8} in the ('S' bend) (and) (pipes) when used  
 Prevents the build-up of {insert soils from list on page 8} in the 'S' bend and pipes when used regularly to help water flow optimally  
 Professional strength cleaning  
 Quickly removes {insert soils from list on page 8}  
 Reduces odor-causing bacteria  
 Reduces odor-causing bacteria above and below the waterline  
 Reduces odor-causing bacteria in toilets  
 Releases powerful cleaning agents on contact  
 Removes {insert soils from list on page 8} (above) (and) (below) (the waterline)  
 Removes {insert soils from list on page 8} through the 'S' bend (and pipes)  
 Removes lime and (&) rust  
 Removes odors  
 Removes offensive odors from toilets  
 Removes rust and (&) mineral stains  
 Removes rust stains and (&) mineral stains  
 Removes stains fast with less work  
 Removes stains right before your eyes  
 Removes tough rust and (&) mineral stains  
 Removes (tough) rust (stains)  
 Removes tough stains (on contact)

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Stain grabbing power  
 (Starts to) Dissolve(s) {insert soils from list on page 8} right before you eyes  
 Starts to dissolve stains instantly  
 (Starts to) remove (dissolve) stains (on contact) (instantly)  
 Starts to remove stains on contact  
 Strong enough for the dirtiest toilet bowl  
 Strong enough to clean the dirtiest toilet bowl  
 The professional strength cleaning power leaves the bowl sanitary  
 (The) Toughest stains (instantly) disappear  
 Tough cleaning power  
 Use daily to prevent build-up of (lime scale) (rust) stains  
 Use regularly to help prevent (build-up of) {insert soils from list on page 8}  
 Use regularly to maintain a clean, fresh and shiny toilet bowl (even under the rim)  
 Watch {insert soils from list on page 8} (start to) disappear  
 Watch {insert soils from list on page 8} (start to) (disappear) (dissolve) right before your eyes  
 Watch stains disappear right before your eyes  
 Watch the toughest stains disappear

<< USE SITE / SURFACES / SOILS >> << May be listed on product label in the singular / plural form >>			
Use Sites:	Clinics Day Care Centers Dental Offices Doctor Offices Health Care Facilities Homes (Households)	Hospitals Hotels / Motels Infirmaries Institutions Laboratories	Nursing Homes Office Buildings Physician's Offices Restaurants Schools
Surfaces:	Bidets Toilets Urinals	Porcelain Vitreous china	
Soils:	Hard water Lime Lime scale Mineral	Organic soil Rust Toilet rings	Build-up Deposits Stains

<< SANITIZING CLAIMS – Hard, non-porous, non-food contact surface >>

Kills bacteria in seconds\*\*\*  
 Kills 99.9% of bacteria in seconds\*\*\*  
 Kills 99.9% of bacteria commonly found in toilets in 30 seconds\*\*\*  
 Kills 99.9% of common bacteria\*\*\*  
 Kills 99.9% of (household) bacteria\*\*\*  
 Kills 99.9% of (household) bacteria in 30 seconds\*\*\*  
 Kills 99.9% of (household) bacteria in 30 seconds above the waterline\*\*\*  
 Kills in 30 seconds: (Enterobacter aerogenes) (Escherichia coli O157:H7) (and) (Staphylococcus aureus)  
 Leaves your toilet bowl sanitized  
 Sanitizes toilet surfaces in 30 seconds\*\*\*  
 Sanitizes in 30 seconds: (Enterobacter aerogenes) (Escherichia coli O157:H7) (and) (Staphylococcus aureus)

**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.  
 To use the term "germ\*\*\*" the product must be efficacious against 2 of the 3 major classes of organisms.  
 The product label must identify the specific bacteria\*, virus\*, fungus\* & mold\*.  
 The term ( x ) is a placeholder that represents a number between 1 and 99.

<< SUPPORTING SANITIZING CLAIM QUALIFIER >>

\*\*\* Kills 99.9% of (Enterobacter aerogenes) (Escherichia coli O157:H7) (and) (Staphylococcus aureus) inside the toilet above the waterline in 30 seconds.

<< DISINFECTING CLAIMS – Hard, non-porous surface >>

Cleans and disinfects the bowl and beyond  
Disinfects above and below the waterline  
Disinfects and breaks down stains  
Disinfects and deodorizes by killing common bathroom germs\*\*  
Disinfects and sanitizes toilets, (bidets) (and) (urinals)  
Disinfects beyond the bowl (and) (in the mouth trap)  
Disinfects in 10 minutes  
Disinfects in hard to reach areas (like) (under the rim) (and) (into the 'S' bend)  
Disinfects, sanitizes and deodorizes by killing common (household) germs\*\* and controlling their odors  
Disinfects the bowl and beyond (in the mouth trap) (where you can't see)  
Disinfects the bowl (and in the mouth trap)  
Disinfects where you can't see (under the rim)  
Easily and effectively disinfects toilet bowls (and urinals)  
Gives you (full) (complete) (total) disinfection inside the toilet  
Helps reduce germs by killing bacteria and viruses found in the toilet  
It clings to the surface to kill germs\*\* and clean tough stains  
Kills bacteria\*  
Kills (more than) (99.9% of) bacteria and (&) viruses\*\*  
Kills (more than) (99.9% of) viruses and (&) bacteria\*\*  
Kills (99.9% of) bacteria and (&) viruses above and below the waterline\*\*  
Kills (99.9% of) bacteria and (&) viruses in hard to reach areas (like) (under the rim) (and) (into the 'S' bend)\*\*  
Kills (99.9% of) bacteria and (&) viruses where you can't see (like) (under the rim) (and) (into the 'S' bend)\*\*  
Kills (99.9% of) Germs\*\*  
Kills (99.9% of) germs above and below the waterline\*\*  
Kills (99.9% of) germs beyond the bowl in the mouth trap\*\*  
Kills (99.9% of) germs in hard to reach areas\*\*  
Kills (99.9% of) germs in hard to reach areas (like) (under the rim) (and) (into the 'S' bend)\*\*  
Kills (99.9% of) germs in the bowl and beyond (in the mouth trap)\*\*  
Kills (99.9% of) germs in the bowl and in the mouth trap (where you can't see)\*\*  
Kills (99.9% of) germs in the bowl and the mouth trap\*\*  
Kills (99.9% of) germs where you can't see\*\*  
Kills (99.9% of) germs where you can't see (like) (under the rim) (and) (into the 'S' bend)\*\*  
Kills (99.9% of) viruses and bacteria\*\*  
Kills germs without the harshness of bleach\*\*  
Kills household Germs\*\*  
Kills (household) (bathroom) (bacteria\*) (viruses†) (germs\*\*) in the toilet  
Kills in 10 minutes: {insert organisms from list on page 10}  
Kills (the) most common germs\*\*  
Kills odor-causing bacteria  
Kills Rotavirus WA (a leading cause of children's diarrhea) in 30 seconds  
Kills the germs\*\* (you know are there but) (you) can't see  
Kills the following (bacteria) (and) (viruses): {insert organisms from list on page 10}  
Kills the following (germs): {insert organisms from list on page 10}  
Kills viruses and bacteria\*\*  
May help keep (bacteria\*) (viruses†) (bacteria & viruses\*\*) from cross-contamination (throughout the home)  
May help keep (germs\*\*) from cross-contamination (throughout the home)  
May help prevent (bacteria\*) (viruses†) (bacteria & viruses\*\*) from cross-contamination (throughout the home)  
May help prevent (germs\*\*) from cross-contamination (throughout the home)  
Penetrates to (kill) (eliminate) (and) destroy tough (stains) and bacteria\*  
Proven to kill: {insert organisms from list on page 10}  
Starts killing 99.9% of germs on contact\*\*  
Starts to kill 99.9% of germs on contact\*\*

**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.  
To use the term "germ\*\*" the product must be efficacious against 2 of the 3 major classes of organisms.  
The product label must identify the specific bacteria\*, virus\*, fungus\* & mold\*.  
The term ( x ) is a placeholder that represents a number between 1 and 99.

This product is (bactericidal) (and) (virucidal) in killing: {insert organisms from list on page 10}  
Total disinfection for inside your toilet (above and below the waterline)

<< SUPPORTING DISINFECTING CLAIM QUALIFIERS >>

- \* Kills (Enterococcus faecalis) (Escherichia coli) (Klebsiella pneumoniae) (Pseudomonas aeruginosa) (Salmonella enterica) (Shigella dysenteriae) (and) (Staphylococcus aureus) (on hard, non-porous surfaces) (in 10 minutes)
- \*\* Kills (Enterococcus faecalis) (Escherichia coli) (Klebsiella pneumoniae) (Pseudomonas aeruginosa) (Salmonella enterica) (Shigella dysenteriae) (Staphylococcus aureus) (Hepatitis A Virus) (Human Immunodeficiency Virus Type 1) (Poliovirus Type 1) (Rotavirus WA) (on hard, non-porous surfaces) (in 10 minutes).
- † Kills (Hepatitis A Virus) (Human Immunodeficiency Virus Type 1) (Poliovirus Type 1) (and) (Rotavirus WA) (on hard, non-porous surfaces) (in 10 minutes)

This product has been test and found effective against the following micro-organisms:

Bacteria & Virus		
<< Disinfection – Hard, non-porous surfaces >>		
Bacteria (10 minutes)	(ATCC No.)	
Enterococcus faecalis	(828)	(leads to blood infections)
Escherichia coli	(11229)	
Klebsiella pneumoniae	(4532)	(a leading cause of pneumonia & lung illnesses)
Pseudomonas aeruginosa	(15442)	(associated with pneumonia & lung illnesses)
Salmonella enterica	(10708)	(a fecal / orally transmitted bacteria which may lead to food borne disease, food poisoning, diarrhea, dehydration, stomach cramps, fever & vomiting)
Shigella dysenteriae	(11835)	(a leading cause of bloody diarrhea, breaks-down intestinal lining)
Staphylococcus aureus	(6538)	(a leading cause of skin infections, boils, food poisoning, blood infections)
Viruses (10 minutes)	(ATCC No.)	
Hepatitis A Virus	n/a	
Human Immunodeficiency Virus Type 1	n/a	(cause of AIDS Virus)
Poliovirus Type 1	n/a	
Rotavirus WA	(VR-2018)	(a leading cause of infectious diarrhea in children)
Viruses (30 seconds)	(ATCC No.)	
Rotavirus WA	(VR-2018)	(a leading cause of infectious diarrhea in children)
<< Sanitization – Hard, non-porous, non-food contact surfaces >>		
Bacteria (30-seconds)	(ATCC No.)	
Enterobacter aerogenes	(13048)	
Escherichia coli O157:H7	(43888)	
Staphylococcus aureus	(6538)	

Symbol Designation – used on product labels		
Single asterisk ( * )	Bacteria *	Used for identifying disinfection against specific bacteria
Dagger ( † )	Viruses †	Used for identifying disinfection against specific viruses
Double asterisk ( ** )	Germ ***	Used for identifying disinfection against specific bacteria & viruses / fungi
Triple asterisk ( *** )	Sanitizes ***	Used for identifying sanitization against specific bacteria

**Note:** Bracketed information is denoted as: <<directive>>, {insert as noted}, (optional text), [required qualifier].  
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 The product label must identify the specific bacteria\*, virus\*, fungus\* & mold\*.  
 The term ( x ) is a placeholder that represents a number between 1 and 99.

Double dagger ( †† )      Allergens ††      Used for identifying the removal of specific non-living allergens

<< USE DIRECTIONS >>

**DIRECTIONS FOR USE:** It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read the entire label before using product.

**To Open Child Resistant Cap:** Hold bottle firmly with one hand on a flat surface. With other hand, squeeze sides of cap where indicated while turning counterclockwise. Do not remove cap. **Avoid squeezing bottle when opening.** To reseal, twist cap clockwise until tightly closed.

<< Optional Side panel pictogram – can only be used in conjunction with required back panel instructions >>

<< Non-removable Pictogram text >>

**To Open Child Resistant Cap:**

1. Place fingers on marked cap ridges.
2. Squeeze cap firmly and turn counterclockwise until it stops. **Do not remove cap.**
3. To reseal, squeeze cap again and turn clockwise.  
**DO NOT squeeze bottle when opening.**



1. Place fingers on marked cap ridges.
2. Squeeze cap firmly and turn counterclockwise until it stops. Do not remove cap.
3. To reseal, squeeze cap again and turn clockwise.  
**DO NOT squeeze bottle when opening.**

**To Clean / Disinfect (/ Sanitize) (and Remove Allergens††):**

1. Flush toilet before cleaning.
2. Apply 4 oz. to coat the bowl including under the rim. **Do not close lid.**
3. **To Clean:** Scrub entire bowl and under rim thoroughly.  
**Disinfect:** Let sit for 10 minutes. (**Sanitize:** Let sit for 30 seconds.)  
Then flush.
4. Rinse brush in fresh water after use.  
(Repeat if needed.)

**To Remove Tough Stains:** Apply a generous amount of liquid directly onto the tough stains. For severe rust stains, if possible, remove water from bowl first. Let soak for 15 minutes. **Do not close lid.** Follow cleaning directions above. Repeat if necessary.

This product has been specially formulated for use only in (vitreous china) (glazed porcelain) toilet bowls (bidets) (and urinals). It should not be used or placed on toilet bowl lids, vanities, sinks, bathtubs, cabinets, countertops, rugs, etc. Clean up spills and drips immediately. **Do not use with chlorine bleach or any other chemical products.** Will not harm plumbing or septic systems.

<< Additional USE DIRECTIONS (claim specific) – Specific to Professional Branded products Only >>

**KILLS HUMAN IMMUNODEFICIENCY VIRUS TYPE 1 [HIV-1 AIDS Virus] ON PRE-CLEANED ENVIRONMENTAL SURFACES / OBJECTS PREVIOUSLY SOILED WITH BLOOD / BODY FLUIDS,** in health care settings or other settings in which there is an expected likelihood of soiling of inanimate surfaces / objects with blood or body fluids; and in which the surfaces / objects likely to be soiled with blood or body fluids can be associated with the potential for transmission of Human Immunodeficiency Virus Type 1 [HIV-1] [associated with AIDS].

**SPECIAL INSTRUCTIONS FOR CLEANING AND DECONTAMINATION AGAINST HIV-1 OF SURFACES / OBJECTS SOILED WITH BLOOD / BODY FLUIDS:**

- PERSONAL PROTECTION:** When handling items soiled with blood or body fluids, use disposable latex gloves, gowns, masks and eye coverings.
- CLEANING PROCEDURES:** Blood and other body fluids must be thoroughly cleaned from surfaces and objects before application of this product.
- CONTACT TIME:** Allow surface / object to remain wet for 30 seconds.

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The product label must identify the specific bacteria\*, virus\*, fungus\* & mold\*.  
The term ( x ) is a placeholder that represents a number between 1 and 99.

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**DISPOSAL OF INFECTIOUS MATERIALS:** Blood and other body fluids must be autoclaved and disposed of according to local regulations for infectious waste disposal.

<< PRECAUTIONARY / FIRST AID / CHEMICAL HAZARD / STORAGE & DISPOSAL INSTRUCTIONS >>

**PRECAUTIONARY STATEMENTS:** Hazards to Humans and Domestic Animals

**DANGER: CORROSIVE.** Causes irreversible eye damage and skin burns. Harmful if swallowed. Do not get in eyes, on skin or on clothing. Wear protective eyewear [safety glasses / goggles], protective gloves and protective clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. Do not breathe vapor or fumes. Keep out of reach of children.

<< NOTE: First Aid statement may not appear in "box" format for 16 & 24 oz. individual containers due to label constraint >>

FIRST AID	
<b>If in Eyes</b>	<ul style="list-style-type: none"> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>Call a Poison Control Center or doctor for treatment advice.</li> </ul>
<b>If on Skin or Clothing</b>	<ul style="list-style-type: none"> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call a Poison Control Center or doctor for treatment advice.</li> </ul>
<b>If Swallowed</b>	<ul style="list-style-type: none"> <li>Call a Poison Control Center or doctor immediately for treatment advice.</li> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by the Poison Control Center or doctor.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If Inhaled</b>	<ul style="list-style-type: none"> <li>Move person to fresh air.</li> <li>If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth if possible.</li> <li>Call a Poison Control Center or doctor for further treatment advice.</li> </ul>
CONTACT NUMBER	
Questions? Comments or In case of an emergency call toll free (1-800-228-4722) (1-800-677-9218). Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment.	
NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate the use of gastric lavage.	

<< STORAGE & DISPOSAL – Residential containers >>

**STORAGE AND DISPOSAL:**

**STORAGE:** Store in original container, in a cool, well-ventilated area, inaccessible to small children. Keep securely closed.

**PESTICIDE DISPOSAL:** To avoid waste, use all material in this container according to label directions.

**CONTAINER DISPOSAL:** Non-refillable container. Do not reuse or refill this container. If empty: Place in trash or offer for recycling, if available. If partly filled: Call your local solid waste agency for disposal instructions.

<< STORAGE & DISPOSAL – Commercial / Institutional / Industrial containers >>

(NOTE: Residue removal statement is not applicable for this container because it has a CRC plug making it inherently non-refillable.)

**STORAGE AND DISPOSAL:**

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

**STORAGE:** Store in original container in a cool, well-ventilated area, inaccessible to children. Keep securely closed.

**PESTICIDE DISPOSAL:** Pesticide wastes may be 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 according to the label directions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL:** Non-refillable container. Do not reuse or refill this container. (To avoid waste, use all material in this container according to label directions.) If empty: Place in trash or offer for recycling, if available. If partly filled: Call your local solid waste agency for disposal instructions.

**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.  
To use the term "germ\*" the product must be efficacious against 2 of the 3 major classes of organisms.  
The product label must identify the specific bacteria\*, virus\*, fungus\* & mold\*.  
The term ( x ) is a placeholder that represents a number between 1 and 99.

Enlarged View Graphic(s)

<< CRC graphic >>



1. Place fingers on marked cap ridges.
  2. Squeeze cap firmly and turn counterclockwise until it stops. Do not remove cap.
  3. To reseal, squeeze cap again and turn clockwise.
- DO NOT squeeze bottle when opening.

<< 'S' bend graphic >>



**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.  
To use the term "germ\*" the product must be efficacious against 2 of the 3 major classes of organisms.  
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The term ( x ) is a placeholder that represents a number between 1 and 99.





365-81

9/9/2014

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

SEP 9 2014

OFFICE OF  
CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Maureen Miksztal  
Senior Regulatory Manager  
Troy Chemical Company Canada LTD c/o  
8 Vreeland Road  
Florham Park, NJ 07932

**Subject:** MERGAL® BCM Technical  
EPA Registration Number: 365-81  
Application Date: August 5, 2014  
Receipt Date: August 7, 2014

Dear Ms. Miksztal:

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

**Proposed Notification:**

Troy Corporation submitted a notification to revise their label to update the active ingredient label weight, to coincide with the approved CSF value.

**General Comment:**

Based on a review of the material submitted, the following comment applies: your notification to update as referenced above is acceptable and a copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at [campbell.jacqueline@epa.gov](mailto:campbell.jacqueline@epa.gov) or Terria Northern by telephone at (703) 347-0265 or by e-mail at [northern.terria@epa.gov](mailto:northern.terria@epa.gov) during the hours of 8:00am to 4:00pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

Jacqueline Hardy  
Product Manager (34)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 05-31-98

 <b>EPA</b> United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> <b>Registration</b> <input type="checkbox"/> <b>Amendment</b> <input checked="" type="checkbox"/> <b>Other:</b>	OPP Identifier Number <p style="text-align: center; font-size: 1.2em;">XXXXXX</p>
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**Application for Pesticide - Section I**

1. Company/Product Number 365-81	2. EPA Product Manager Jacqueline Hardy	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>MERGal BCM Technical</b>	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) <b>Troy Chemical Company Canada LTD. c/o Troy Corporation</b> <b>8 Vreeland Road</b> <b>Florham Park, N.J. 07932</b> <b><u>PLEASE SEND ALL CORRESPONDENCE TO "CONTACT POINT" LISTED BELOW</u></b> <input type="checkbox"/> Check if this is a new address		6. <b>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**

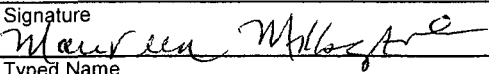
<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification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

**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)  
 Submission of label notification to correct the active label weight. On 6/23/2014, EPA approved this change on the CSF. This notification modifies the active label weight to coincide with CSF value. 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 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 type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input 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
				<input type="checkbox"/> Other (Specify)	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input 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)					
Name <b>Maureen Miksztal</b>	Title Senior Regulatory Manager	Telephone No. (Include Area Code) 973-443-4200, ext. 2285			
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 <b>(Stamped)</b>		
			2. Signature 		3. Title <b>Senior Regulatory Manager</b>
4. Typed Name Maureen Miksztal		5. Date 08/5/2014			



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**TROY CORPORATION**

August 5, 2014

Via Courier

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
Antimicrobial Division (AD)  
U.S. EPA  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202-4501

Attention: Mrs. Jacqueline Hardy, PM 34

RE: **MERGAL<sup>®</sup> BCM Technical, EPA Reg. No. 365-81**  
**Label Notification per PR Notice 98-10**

Dear Mrs. Hardy:

On behalf of Troy Chemical Company Canada Ltd., Troy Corporation hereby submits a label notification in accordance with PR Notice 98-10 for MERGAL<sup>®</sup> BCM Technical, EPA Reg. No. 365-81. This notification is to update the active ingredient label weight. On 6/23/2014, EPA approved this change on the CSF. [see attached approval]. This notification modifies the label weight to coincide with the CSF value.

Included under this cover, please find the following support documents:

- Application form 8570-1
- 1 copy of label with revised wording in [ ]
- Copy of EPA CSF acceptance letter

Please contact me directly should you have any questions concerning this action. I can be reached via email or phone at [miksztaim@troycorp.com](mailto:miksztaim@troycorp.com) or (973)443-4200, ext. 2285.

Sincerely,

Maureen Miksztaim  
Senior Regulatory Manager

Enclosure

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

**CAUTION-CUIDADO**

Causes moderate eye irritation. Avoid contact with eyes, skin and clothing. Wash thoroughly with soap and water after handling.

**FIRST AID**

<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>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.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>Call a poison control center or doctor immediately for treatment advice.</li> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

**NOTE TO PHYSICIAN:**

Probable mucosal damage may contraindicate the use of gastric lavage.

**MERGAL<sup>®</sup> BCM TECHNICAL**

For use in the Formulation of Pesticides, which control Fungi when used in Paints, Coatings, Concrete Admixtures, Plasters, Stuccos, Sealants, Fillers, Architectural Products, Finishes and Special Purpose Coatings

EPA Reg. No.	365-81
EPA Establishment Number	87874-DEU-001

ACTIVE INGREDIENT: .....% Weight  
Methyl (1H-benzimidazol-2-yl) carbamate. .... 98.60%  
INERT INGREDIENTS ..... 1.40%  
TOTAL ..... 100.0%

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION-CUIDADO**

See Side Panel for Additional Precautionary Statements  
**PRECAUCION AL USUARIO:** Si Usted no lee inglés no use este producto hasta que la etiqueta le haya sido explicada completamente.

**IN CASE OF EMERGENCY:**

CALL 1-800-424-9300

Net Weight:

Produced for:

**Troy Chemical Company, LTD**  
Concord, Ontario L4K 4E5 Canada

Made in Germany

POLYPHASE<sup>®</sup> and MERGAL<sup>®</sup> are registered trademarks

**ENVIRO**  
This product is toxic to fish. Do not use in lakes, streams, ponds, or other bodies of water. Do not use in accordance with the requirements of the National Pollution Discharge Elimination System (NPDES) or other water quality regulations. Do not use in areas where the product will be applied to sewer systems or treatment plant authority. For more information, contact the Regional office of the EPA.

**DIRE**  
It is a violation of Federal Law to use this product without its labeling.

Only for use as a fungicide to control the growth of fungi on the manufacture of paints, coatings, sealants or filler surfaces.

**STORAGE**

Do not contaminate water. Store in a cool, dry area out of reach of children.  
**PESTICIDE STORAGE:** Store in a cool, dry area out of reach of children.  
**PESTICIDE DISPOSAL:** Follow the instructions on the label for the proper disposal of excess product. Do not dispose of this product in a landfill or by incineration if all other disposal methods are available.  
**CONTAINER HANDLING:** Do not reuse this container. Completely empty and clean by rinsing bottom to loosen clinging equipment. Offer for recycling if available or by incineration if all other disposal methods are available.

This label provides information for the user. The Seller's present state of knowledge does not warrant that this product or its use will not cause damage to property. SELLER MAKES NO IMPLICIT WARRANTY FOR A PARTIAL RETURN. SELLER SHALL BE LIABLE FOR ANY DAMAGES RELATING TO THE USE OF THIS PRODUCT.

4/5

**EMENTS**  
**ESTIC ANIMALS**

**DADO**

contact with eyes, skin  
soap and water after

inse slowly and gently  
3 minutes. Remove  
sent, after the first 5  
: rinsing eye.  
| center or doctor for

clothing.  
y with plenty of water  
center or doctor for

ol center or doctor  
ant advice.  
ass of water if able to

3 unless told to do so  
anter or doctor.  
ig by mouth to an

when calling a poison

te the use of gastric

**MERGAL<sup>®</sup> BCM TECHNICAL**

For use in the Formulation of Pesticides, which control  
Fungi when used in Paints, Coatings, Concrete  
Admixtures, Plasters, Stuccos, Sealants, Fillers,  
Architectural Products, Finishes and Special Purpose  
Coatings

EPA Reg. No.	365-81
EPA Establishment Number	87874-DEU-001

**ACTIVE INGREDIENT:** .....% Weight  
Methyl (1H-benzimidazol-2-yl) carbamate. .... 98.60%   
**INERT INGREDIENTS** ..... 1.40%  
**TOTAL** ..... 100.0%

**ENVIRONMENTAL HAZARDS**  
This product is toxic to fish. 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 Water Board or Regional office of the EPA.

**DIRECTIONS FOR USE**

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

Only for use as a fungicide to be formulated into pesticides for the following uses: manufacture of paints, coatings, plasters, stuccos, sealants and fillers to inhibit or control the growth of fungi on paints, coatings, plasters, stuccos, sealants or filler surfaces.

**STORAGE AND DISPOSAL**

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

**PESTICIDE STORAGE:** Store unused product in original container only in a cool, dry area out of reach of children or animals.

**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 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 HANDLING:** Non-refillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Offer for recycling, if available or dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities.

**WARRANTY**

This label provides information which Seller believes to be reliable based on Seller's present state of knowledge relating to this product and its application. This information is not intended to be a guarantee of specific properties of this product or its suitability for a particular application. Seller warrants that this product conforms to the chemical description on this label. **SELLER MAKES NO IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER WARRANTY EXCEPT AS EXPRESSLY STATED ABOVE.** In no event, shall Seller be liable for any consequential, special, indirect, or incidental damages relating to the use of this product.

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION-CUIDADO**

See Side Panel for Additional Precautionary Statements  
**PRECAUCION AL USUARIO:** Si Usted no lee inglés no use este producto hasta que la etiqueta le haya sido explicada completamente.

**IN CASE OF EMERGENCY:**

**CALL 1-800-424-9300**

**Net Weight:**

**Produced for:**

**Troy Chemical Company, LTD**

Concord, Ontario L4K 4E5 Canada

Made in Germany

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