

64240-65

12-22-2010

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

DEC 2 2 2010

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Georgia Anastasiou
Agent for Combat Insect Control Systems
Lewis & Harrison
122 C Street, N.W., Suite 740
Washington, DC 20001

Subject: WC Complete
EPA Registration Number: 64240-65
Application Date: November 30, 2010
EPA Receipt Date: December 1, 2010

Dear Ms. Anastasiou:

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

Proposed Notification:

- 1.) Revised claim #24 on page 5 by adding the optional word "Cleaner;"
- 2.) Qualify claim #27 on page 5 by adding a double asterisk that indicated "hard non-porous surfaces"
- 3.) Added marketing language on page 7: "Foam or Spray," "Foam (Closed Screen)," and "Spray (Open Screen)."

General Comments:

Based on a review of the submitted materials, your notification for the revised marketing language as referenced above is acceptable, and has been placed in your file for future reference.

If you have further questions concerning this letter, please contact me at (703) 308-6416 or by email campbell-mcfarlane.jacqueline@epa.gov or Killian Swift at (703) 308-6346 or by email at swift.killian@epa.gov.

Sincerely,

Jacqueline Campbell-McFarlane
Jacqueline Campbell-McFarlane
Product Manager (34)

Concurrent Management Branch II

Antimicrobials Division (7510P)

SYMBOL							
SURNAME							
DATE							



United States
Environmental Protection Agency
 Washington, DC 20460

- Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number 64240-65	2. EPA Product Manager Jacqueline Campbell-McFarlane	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) WC Complete	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) Combat Insect Control Systems c/o Henkel Consumer Goods Inc. 19001 N. Scottsdale Rd. Scottsdale, AZ 85255 <i>PLEASE SEND ALL CORRESPONDENCE TO "CONTACT POINT" LISTED BELOW</i> <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 in accordance with PR Notice 98-10. Please read cover letter for details

Notification per PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 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 type="checkbox"/> Metal	
*Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container	<input checked="" type="checkbox"/> Plastic	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 500 mL, 750 mL, 1.0L		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 type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input checked="" type="checkbox"/> Other: Shrink sleeve (plastic)	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Georgia Anastasiou, Lewis & Harrison 122 C Street, NW – Suite 740, Washington DC 20001	Title Agent for Combat Insect Control Systems	Telephone No. (Include Area Code) 202-393-3903 x19
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 <i>Georgia Anastasiou</i>	3. Title Agent for Combat Insect Control Systems	
4. Typed Name Georgia Anastasiou	5. Date November 29, 2010	

LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 740
Washington, D.C. 20001
telephone 202.393.3903
fax 202.393.3906

November 30, 2010

HAND-DELIVERED

Document Processing Desk (Notif)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

**ATTENTION: Jacqueline Campbell-McFarlane
Product Manager 34**

**SUBJECT: WC Complete (EPA Reg. No. 64240-65)
Notification per PR Notice 98-10**

Dear Ms. Campbell-McFarlane:

On behalf of Combat Insect Control Systems, I am submitting a notification for the product **WC Complete (EPA Reg. No. 64240-65)**. The purpose of this notification is to revise the marketing language. Below I have listed the revisions to the label.

1. Revised claim #24 on page 5 by adding the optional word "Cleaner".
2. Revised claim #27 on page 5 by allowing the claim to be split with the intent that the language "Cleans & Disinfects All Bathroom Surfaces" is qualified with a double asterisk that specifies "Hard Non-Porous Surfaces."
3. Added the following marketing language on page 7 which is a reiteration of previously approved language: "Foam or Spray" "Foam (Closed Screen)" "Spray (Open Screen)".

Enclosed please find the following documents in support of this submission:

- A. Application for Pesticide Form;
- B. One (1) copy of the revised label with changes highlighted; and,
- C. Two (2) copies of the revised label.

Thank you in advance for your assistance with this submission. If you have any questions, please call me at 202-393-3903 ext. 19 or e-mail me at georgia@lewisharrison.com.

Sincerely,



Georgia Anastasiou
Agent for,
Combat Insect Control Systems

cc: David Rickard (Combat)

Note: **Bold, Italicized text** is information for the reader and is not part of the label.

Highlighted text is new

[Bracketed information is optional or alternative text.]

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MASTER LABEL

EPA Reg. No. 64240-65

WC Complete 29 NOV 2010

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PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

CAUTION: Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

FIRST AID: 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. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information [on WC Complete] call [SafetyCall International at] 1-866-338-8517[, 24h/day, seven days a week].

Physical or Chemical Hazards: Contains lactic acid. Do not mix with chlorine bleach or other household chemicals, as hazardous gases may be released.

{Note to Reviewer: Per PR-Notice 2007-4, this product will receive a batch code. The number will be laser-coded on the primary package.}

UPC bar code

Distributed by Combat Insect Control Systems
[19001 N Scottsdale Rd] SCOTTSDALE, AZ 85255

MADE IN THE U.S.A.

Questions or comments? Call 1-800-290-0158

Or visit us at www.softscrub.com



-or-



-or-



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MASTER LABEL

EPA Reg. No. 64240-65

WC Complete 29 NOV 2010

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DIRECTIONS FOR USE: It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Graphics below are representative of, but not necessarily exact depictions of, figures for the final label.

[Use]

WC COMPLETE [OR ABN ON PAGE 1]

[For]

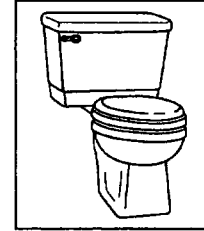
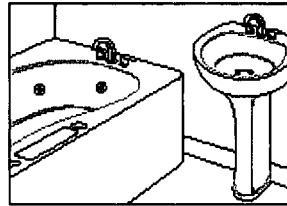
[To Clean]

[To Remove]

[Soap Scum][&][Stains]

[Calcium [&] [Lime] [Limescale]

[Toilet Ring]



Usage Areas: Use around [your] [the] house to clean [even] tough stains and build up. Use on hard, nonporous surfaces [such as plastic laminate, sealed granite, cultured marble, stainless steel, glass, chrome, and glazed porcelain]. Works great on sinks, bathtubs, shower doors, glazed tile, toilet bowls, faucets and fixtures. For other surfaces, spot test in an inconspicuous area. Not recommended for use on natural stone, copper and brass. Avoid contact with wood, fabric, vinyl, painted surfaces and wallpaper.

To clean and deodorize:

[1] Choose SPRAY or FOAM

- For lighter spot cleaning or larger surface areas

Spray: Open screen and rotate to "SPRAY" [*graphic depiction of the nozzle in SPRAY position*]

- For heavier cleaning or more focused surface areas

Foam: Close screen and rotate to FOAM [*graphic depiction of the nozzle in FOAM position*]

[2] Spray [or apply foam] 6-8 inches from surface.

[3] Wipe thoroughly with a clean, damp cloth or sponge.

[4] For heavily soiled areas, let product stand several minutes then wipe and rinse with water (if needed).

[5] [To get at hard to reach areas like under the toilet rim, invert bottle for optimal cleaning.]

[5]-or-[6] Rotate nozzle to STOP position after use.

To disinfect hard non-porous surfaces: Apply product [by spray or foam] and leave on surface for 10 minutes before wiping clean. Heavily soiled surfaces must be pre-cleaned prior to disinfecting.

To sanitize hard non-porous surfaces: Apply product [by spray or foam] and leave on surface for 30 seconds before wiping clean. Pre-clean surfaces prior to sanitizing.

To clean inside toilet bowl: Set to FOAM and invert bottle to spray sides and under rim of toilet bowl. Let stand for several minutes, then brush and flush. Heavily soiled surfaces must be pre-cleaned prior to disinfecting.

To disinfect inside toilet bowl: Empty water from toilet. Set to FOAM and invert bottle to spray sides and under rim of toilet bowl. Let stand for 10 minutes, then brush and flush. Heavily soiled surfaces must be pre-cleaned prior to disinfecting.

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MASTER LABEL
EPA Reg. No. 64240-65
WC Complete 29 NOV 2010
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Note to Reviewer: Household/Residential Storage Disposal Statements

Storage & Disposal

Store in cool place well-ventilated area inaccessible to small children and pets. Non-refillable container. Do not re-use or refill this container. Offer for recycling if available or discard in trash.

Note to Reviewer: All uses other than Household/Residential Storage Disposal Statements

Storage & Disposal

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

Pesticide Storage: Store in a cool, well-ventilated area inaccessible to small children and pets.

Pesticide Disposal: To avoid wastes, use all material in this container by application according to label directions. If wastes cannot be avoided, offer remaining product to a waste disposal facility or pesticide disposal program.

Container Handling: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available or discard in trash.

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MASTER LABEL
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Claims for Front or Back Panel
Disinfecting, Sanitizing and Cleaning Claims:

1. Antibacterial Cleanser
2. Antibacterial
3. Antibacterial Action
4. Kills Bacteria
5. Kills Odor-Causing Bacteria
6. Kills Toilet Germs*
7. Disinfectant [Disinfecting]
8. Disinfects & Deodorizes
9. Disinfects
10. Disinfects and Deodorizes by Killing Germs* and Their Odors
11. Bathroom Disinfectant
12. Multi-Purpose Disinfectant
13. Multi-Room [Multi Purpose] [Multi-Surface] Cleanser
14. Kills Salmonella enterica [ATCC 10708] (Salmonella) in 10 minutes at full strength
15. Kills Pseudomonas aeruginosa [ATCC 15442] (Pseudomonas) in 10 minutes at full strength
16. Kills Staphylococcus aureus [ATCC 6538] (Staph) in 10 minutes at full strength
17. Kills 99.9% of Salmonella enterica [ATCC 10708] (Salmonella) in 10 minutes at full strength
18. Kills 99.9% of Pseudomonas aeruginosa [ATCC 15442] (Pseudomonas) in 10 minutes at full strength
19. Kills 99.9% of Staphylococcus aureus [ATCC 6538] (Staph) in 10 minutes at full strength
20. Kills Influenza A [Virus] In 30 Seconds
21. Kills Rotavirus In 30 Seconds
22. Kills Rhinovirus [Type 39] In 30 Seconds
23. Disinfectant Cleanser
24. Disinfecting [Cleaner] [Cleanser]
25. Home Disinfectant [Cleanser]
26. Cleans And Disinfects
27. Cleans & Disinfects All Bathroom Surfaces** [Even Inside Toilets]
 **Hard Non-Porous Surfaces
28. Sanitizes All Bathroom Hard Non-Porous Surfaces [Even Inside Toilets]
29. Cleans And Disinfects All Bathroom Hard Non-Porous Surfaces [Even Inside Toilets]
30. Leaves Surfaces Sanitary
31. Sanitizer
32. Sanitizes Non-Porous Surfaces
33. Sanitizes Hard, Non-Porous Surfaces
34. Eliminates [Wipes Out] Odors Caused By [Bacteria]
35. Bactericide [Bactericidal]

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Claims for Front or Back Panel
Disinfectant and Sanitizer claims, bullets/bursts/sentences:

1. Germicide [Germicidal]
2. Virucide [Virucidal]
3. Removes Mold and Mildew
4. Inhibits [Growth of] Mold and Mildew
5. Hospital Disinfectant Cleaner [Cleanser]
6. Industrial Disinfectant Cleaner [Cleanser]
7. Institutional Disinfectant Cleaner [Cleanser]
8. Healthcare Disinfectant Cleaner [Cleanser]
9. Sanitizes surfaces in 30 seconds. Kills 99.9% of common [household] germs*
* Kills Salmonella enterica and Staphylococcus aureus in 10 minutes at full strength and [Influenza A] [Rotavirus] [Rhinovirus [Type 39]] Virus In 30 Seconds
10. Sanitizes surfaces in 30 seconds. Kills 99.9% of Staphylococcus aureus [ATCC 6538] (Staph) in 30 seconds at full strength
11. Sanitizes surfaces in 30 seconds. Kills 99.9% of Enterobacter aerogenes [ATCC 13048] in 30 seconds at full strength
12. Sanitizes surfaces in 30 seconds. Kills 99.9% of Shigella sonnei [ATCC 25931] in 30 seconds at full strength
13. Sanitizes surfaces in 30 seconds. Kills 99.9% of Escherichia coli [ATCC 11229] in 30 seconds at full strength
14. [Respiratory illnesses attributable to Pandemic 2009 H1N1 are caused by influenza A virus. [This product] ~~[-OR- ACCEPTED ABM]~~ is a broad-spectrum hard surface disinfectant that has been shown to be effective against influenza A virus and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 (formerly called swine flu).]
15. [[This product] ~~[-OR- ACCEPTED ABM]~~ has demonstrated effectiveness against influenza A virus and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 influenza A virus.]
16. [[This product] ~~[-OR- ACCEPTED ABM]~~ has demonstrated effectiveness against influenza A virus and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 (formerly called swine flu).]
17. [Kills Pandemic 2009 H1N1 influenza A virus (formerly called swine flu).]
18. [Kills Pandemic 2009 H1N1 influenza A virus.]
19. Kills Bacteria [Germs*]
* Kills Salmonella enterica and Staphylococcus aureus in 10 minutes at full strength and [Influenza A] [Rotavirus] [Rhinovirus [Type 39]] Virus In 30 Seconds

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MASTER LABEL
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WC Complete 29 NOV 2010
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Front or Back Panel

Non-disinfectant/sanitizer claims, bullets/bursts/sentences:

- Cleans [& Deodorizes] Your Entire Bathroom – Even [Inside] [The] Toilet[s]
- [Cleans] [Fights] [Removes] [Tough] Stains
- Tough [Great] [On] [For] [Stains] [Calcium] [Lime Scale] [Hard Water] [Soap Scum] [Rust] [Soils] [Greasy Dirt] [Outdoor Soils]
- Commercial
- Custodian/Custodial
- Industrial
- Institutional
- Residential
- Food Service
- [Henkel Consumer Goods Inc.] [Henkel] [Commercial] [Products] [Series]
- Multi-Surface Cleaner
- Tough Cleaning [Action] [Power]
- [Great] [Good] For Heavy Duty Cleaning
- Your Complete Bathroom [Caddy] [Arsenal] [In One Product]
- [Trigger] [Even] [Sprays] [Works] [Upside Down] [Sideways] *[May include an illustration or graphic depiction of the container shown upside down.]*
- Sprays A Thick Foam And A Fine Mist
- Powerful Foaming Action
- Sprays 360 Degrees
- Thick Foam Clings To [Toilet Bowl] [Sides Of Toilet] [Shower Walls] [Tubs]
- Strong Enough For Your Toilet
- One Product, Multiple Uses
- Tough On Stains
- Has A [Clean] [Pleasant] [Fresh] [Scent] [Fragrance]
- Easy To Use Trigger
- The Ultimate Clean
- A Clean You Can Trust
- A Clean You Can See And Feel
- Deodorizes
- Makes Cleaning The Bathroom Easier
- Saves Time When Cleaning
- Cleans Your Bathroom Inside And Out
- Cleans To The Nth Degree
- Totally Rethink Clean
- Fresh Scent
- Foam or Spray
- Foam (Closed Screen)
- Spray (Open Screen)

Removes or Cleans:

- Bathroom [Soils] [Dirt]
- General Household Dirt
- Outdoor Soils
- [Tough] [Greasy] Dirt
- [Tough] Soils
- [Tough] Grease [And Grime]
- Bath Tub Rings
- Fingerprints Or Smudges
- Grime
- Soap Scum
- Toilet Ring
- [Toilet] Rust
- Limescale
- Mineral Deposits
- [Hard] Water Deposits
- Calcium

- Cleans Garbage Can[s]
- Cleans Trash Can[s]
- Cleans Waste Receptacle[s]

Other:

Good Housekeeping Seal of Approval



(to be used only upon consent of this third party)

“NSF Listed”



(to be used only upon consent of this third party)

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EPA Reg. No. 64240-65

WC Complete 29 NOV 2010

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Front or Back Panel

Surfaces for Disinfecting, Sanitizing and Cleaning:

- [Bath] Tub
- [Imitation] [Cultured] [Synthetic] Marble
- Bathroom [Sink] [Countertop] [Counter] [Tile] [Floors] [Fixtures] [Appliances]
- Sealed Fiberglass [Doors] [Shelves] [Surfaces]
- Glass [Shower Doors]
- Plastic Laminate [Formica®]
- Glazed [Ceramic] Tile
- Glazed Porcelain [Tile]
- Hard Surface [Glazed Tile] Floors
- Non-Food Contact
- Nonporous [Hard] [Solid] Surfaces
- Toilets (Inside And Outside)
- Shower [Stalls]
- Doorknobs
- Stainless Steel
- Sealed Granite

Locations for Disinfecting, Sanitizing and Cleaning:

- Medical [Clinics] [Facilities]
- Hospitals
- Healthcare [Facilities]
- Nursing Homes
- Health Clubs
- Industrial Facilities
- Institutions
- Manufacturing [Facilities] [Plants]
- Hotels [Motels]
- Office Buildings
- Prisons
- Correctional [Facilities] [Institutes]
- Public Transportation
- Day Care Facilities
- Schools
- Colleges
- Universities
- Sports Facilities