

64240-65

1/30/2013

1/12

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

January 30, 2013

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

Subject: **WC Complete**
EPA Registration Number: 64240-65
Application Date: December 28, 2012
Receipt Date: December 31, 2012

Dear Ms. Anastasiou:

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

Proposed Notification

Combat Insect Control Systems is initiating the following revisions for label WC Complete Registration No. 64240-65.

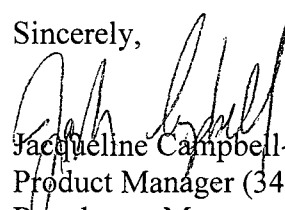
- Adding optional language under the Directions for Use for "spray or foam option", page 3
- Adding marketing language and graphics depicting other Soft Scrub products, page 4
- Revised and updated marketing claims and language under "Optional Disinfectant/Sanitizing Claims for front and back panel", pages 5-8
- Adding the Kosher graphic symbol of the Union of Orthodox Jewish Congregations, page 9.

General Comments


Based on a review of the submitted materials, adding optional marketing claims, application methods and graphics per PR Notice 98-10 is **acceptable** and apart of the record on 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-mcfarlane.jacqueline@epa.gov or Lorena Rivas by telephone at (703) 305-5027 or by e-mail at rivas.lorena@epa.gov. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,


Jacqueline Campbell-McFarlane
Product Manager (34)

Regulatory Management Branch II
Antimicrobials Division (7510P)

CONCURRENCES					
SYMBOL	7510P				
SURNAME					
DATE	1/30/13				



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.
- Resubmission in response to Agency letter dated _____
- Notification – Explain below.
- Final printed labels in response to Agency letter dated _____
- "Me Too" Application
- 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	<input checked="" 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 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: <u>Shrink sleeve (plastic)</u>	

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
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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 December 28, 2012

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LEWIS & HARRISON

122 C Street, N.W., Suite 505
Washington, D.C. 20001
telephone 202.393.3903
fax 202.393.3906

Consultants in Government Affairs

December 28, 2012

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 make minor revisions to the label. Below I have listed the revisions to the label.

1. Reformat the EPA label by adding section headers to clearly identify the different sections of the label for the reviewer. Please note this language will not appear on the market labels.
2. Add optional language to open and close nozzle for spray or foam option.
3. Add marketing language and graphics depicting other Soft Scrub products.
4. Add marketing language that is a reiteration of already approved language. All new language is highlighted.
5. Add the Kosher symbol. Enclosed is a copy of the Kosher certification. Please note the certification lists the approved alternate brand for this product - *Soft Scrub Total Bath and Bowl Cleaner*.

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

Georgia Anastasiou
Agent for Combat Insect Control Systems

cc: Patricia McFadden (Combat)

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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 December 28, 2012
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Front Panel Language

WC Complete

Approved Alternate Brand Names:

Soft Scrub Total Brand Bath and Bowl (approved on 3/9/10)

Soft Scrub Total Brand Bath and [&] Bowl Fresh Scent (approved on 3/9/10)

Ingredient Statement

ACTIVE INGREDIENT: Lactic Acid4.0%

OTHER INGREDIENTS:96.0%

TOTAL:100.0%

KEEP OUT OF REACH OF CHILDREN

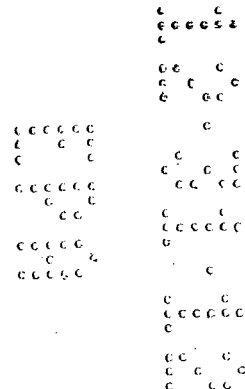
CAUTION: Causes moderate eye irritation

Read back panel carefully

Net Contents: _____

EPA Reg. No. 64240-65

EPA Est. No. _____



NOTIFICATION
Date Reviewed: 1/30/13
Reviewed By: [Signature]

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MASTER LABEL

EPA Reg. No. 64240-65

WC Complete December 28, 2012

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Precautionary Language

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.

Storage and Disposal Language

Note to Reviewer: Household/Residential Storage Disposal Statements

Storage & Disposal

Store in cool, 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.

Batch Code Information

{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.}

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Directions for Use

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

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

- **Spray:** [Open flip tab on end of nozzle] [Open screen] [and rotate to "SPRAY"]
For lighter spot cleaning or larger surface areas
[graphic depiction of the nozzle in SPRAY position]
- **Foam:** [Close flip tab on end of nozzle] [Close screen] [and rotate to FOAM]
For heavier cleaning or more focused surface areas
[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.

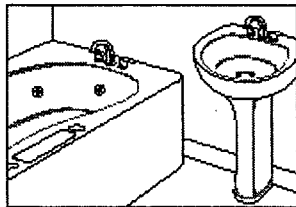
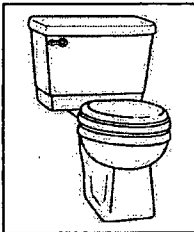
To sanitize hard non-porous surfaces: Apply product [by spray or foam] and leave on surface for 30 seconds before wiping clean. Pre-clean surfaces prior to sanitizing.

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.

OPTIONAL GRAPHICS Illustration of suggested use areas.

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



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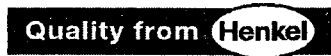
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Optional Henkel Business Language (front or back panels)



-or-



-or-



[UPC bar code]

[The distinctive design and elements of this package are proprietary and owned by:]

© [2012] [2013] [2014] Distributed by [Combat Insect Control Systems] [The Dial Corporation, A Henkel Company]

[19001 N Scottsdale Rd] SCOTTSDALE, [AZ] [Arizona] 85255

MADE IN THE U.S.A.

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

[Or] visit [us at] www.softscrub.com

[Also try...]

[Try our other Soft Scrub products[!]]

[Try our family of Soft Scrub products[!]]

OPTIONAL GRAPHICS – Pictures and names of other Dial products in the Soft Scrub line.



Advanced Surface
[Cleaner & Polish]



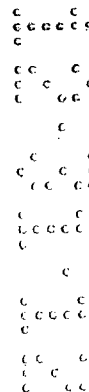
Mold and Mildew
Stain Remover



All Purpose
Cleaner



All Purpose Cleaner
with Bleach



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EPA Reg. No. 64240-65

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Optional Disinfecting/Sanitizing Claims for front or back panel

1. Antibacterial Cleanser
2. Antibacterial [Action]
3. [Disinfectant] [Disinfects]
4. [Bathroom] [Multi-Purpose] Disinfectant
5. Disinfects [and] [&] deodorizes
6. Eliminates [Wipes Out] Odors Caused By [Bacteria]
7. Kills [Odor-Causing] Bacteria
8. Hospital Disinfectant Cleaner [Cleanser]
9. Industrial Disinfectant Cleaner [Cleanser]
10. Institutional Disinfectant Cleaner [Cleanser]
11. Healthcare Disinfectant Cleaner [Cleanser]
12. Disinfecting [Cleaner] [Cleanser]
13. [Home] [Bathroom] [Multi-Purpose] Disinfectant [Cleanser]
14. Bactericide [Bactericidal]
15. Germicide [Germicidal]
16. Virucide [Virucidal]
17. Cleans [And] [&] Disinfects
18. Cleans [and] [&] Disinfects All Bathroom Surfaces** [Even Inside Toilets]
 **Hard Non-Porous Surfaces
19. Cleans [And] [&] Disinfects All Bathroom Hard Non-Porous Surfaces [Even Inside Toilets]
20. Cleans [and] [&] disinfects [your] bathroom [!]
21. Leaves Surfaces Sanitary
22. Sanitizes [All Bathroom] Hard Non-Porous Surfaces [Even Inside Toilets]
23. Sanitizer
24. [Fights] [Removes] Mold and Mildew
25. Inhibits [the] [Growth of] Mold and Mildew
26. Disinfects [and] [&] Deodorizes [by Killing Germs* and Their Odors]
 * Kills [Salmonella enterica] [Escherichia coli] [Shigella sonnei] [Staphylococcus aureus] [Pseudomonas aeruginosa] [Rhinovirus] [and] [Influenza A [virus]]
27. Kills Toilet Germs*
 * Kills [Salmonella enterica] [Escherichia coli] [Shigella sonnei] [and] [Rotavirus]
28. [Sanitizes surfaces in 30 seconds.] Kills [bacteria] -or- [99.9% of] [common] [household] germs*
 * [Kills] [Salmonella enterica] [Escherichia coli] [Shigella sonnei] [Staphylococcus aureus] [and] [Pseudomonas aeruginosa] [in 10 minutes] [at full strength] [and] [Influenza A [Virus]] [Rotavirus] [Rhinovirus [Type 39]] [In 30 Seconds] [at full strength]
29. Kills [99.9% of] Salmonella enterica [ATCC 10708] [(Salmonella)] [in 10 minutes] [at full strength]
30. Kills [99.9% of] Pseudomonas aeruginosa [ATCC 15442] [(Pseudomonas)] [in 10 minutes] [at full strength]

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Optional Disinfecting/Sanitizing Claims for front or back panel (Continued)

- 31. [Sanitizes surfaces in 30 seconds.] Kills [99.9% of] Staphylococcus aureus [ATCC 6538] [(Staph)] [in 10 minutes] [at full strength]
- 32. [Sanitizes surfaces in 30 seconds.] Kills 99.9% of Enterobacter aerogenes [ATCC 13048] [in 30 seconds] [at full strength]
- 33. [Sanitizes surfaces in 30 seconds.] Kills [99.9% of] Shigella sonnei [ATCC 25931] [in 30 seconds] [at full strength]
- 34. [Sanitizes surfaces in 30 seconds.] Kills [99.9% of] Escherichia coli [ATCC 11229] [in 30 seconds] [at full strength]
- 35. Kills Influenza A [Virus] [In 30 Seconds]
- 36. Kills Rotavirus [In 30 Seconds]
- 37. Kills Rhinovirus [Type 39] [In 30 Seconds]
- 38. Kills [flu] virus[es]* [in 30 seconds] *Kills Influenza A [virus]
- 39. Kills [flu] virus[es]* *Kills Influenza A [virus] [n 30 seconds]
- 40. Kills [cold] [and] [&] [flu] virus[es]* [in 30 seconds] *Kills Influenza A [virus] and Rhinovirus
- 41. Kills [cold] [and] [&] [flu] virus[es]* *Kills Influenza A [virus] and Rhinovirus [in 30 seconds]
- 42. [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).]
- 43. [[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.]
- 44. [[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).]
- 45. [Kills Pandemic 2009 H1N1 influenza A virus (formerly called swine flu)]
- 46. [Kills Pandemic 2009 H1N1 influenza A virus.]

Optional General / Cleaning Claims for front or back panel

- 47. [Bathroom] [Multi-Room] [Multi Purpose] [Multi-Surface] [Cleanser] [Cleaner]
- 48. Cleans [& Deodorizes] [Your] [the] Bathroom – Even [Inside] [The] Toilet[s]
- 49. Commercial
- 50. Custodian / Custodial
- 51. Industrial
- 52. Institutional
- 53. Residential
- 54. Food Service
- 55. [Henkel Consumer Goods Inc.] [Henkel] [Commercial] [Products] [Series]
- 56. Tough Cleaning [Action] [Power]

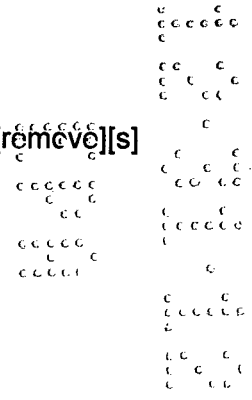
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- 57. [Great] [Good] For Heavy Duty Cleaning
- 58. Your Complete Bathroom [Caddy] [Arsenal] [In One Product]
- 59. [Trigger] [Even] [Sprays] [Works] [Upside Down] [Sideways]
[May include illustration/graphic depiction of the container shown upside down.]
- 60. Sprays [A Thick Foam] [And] [&] [A Fine Mist]
- 61. [Powerful] Foaming Action
- 62. Sprays 360 Degrees
- 63. Thick Foam Clings To [Toilet Bowl] [Sides Of Toilet] [Shower Walls] [Tubs]
- 64. Strong Enough For Your Toilet
- 65. One Product, [Multiple] [Many] Uses
- 66. [Has] [A] [Clean] [Pleasant] [Fresh] [Scent] [Fragrance]
- 67. Easy To Use Trigger
- 68. The Ultimate Clean
- 69. A Clean You Can [Trust] [See And Feel]
- 70. Deodorizes
- 71. Makes cleaning [the] [your] [bathroom] [home] easier
- 72. Saves Time When Cleaning
- 73. Cleans [Your Bathroom Inside And Out] [To The Nth Degree]
- 74. Totally Rethink Clean
- 75. Fresh Scent
- 76. Foam or Spray
- 77. Foam (Closed Screen)
- 78. Spray (Open Screen)
- 79. [Tough on Stains] [and] [&] [Gentle on Surfaces] [!]
- 80. New Look [!]
- 81. New [!]
- 82. [Use] [great] [WC Complete or approved ABN] [for] [to] [clean][s][ing] [remove][s]
[removing] [fights] [tough] [on]
 - a. Bathroom [Soil][s] [Dirt]
 - b. Bathtub[s] [Ring][s]
 - c. Calcium
 - d. [Fingerprints] [Or] [and] [&] [Smudges]
 - e. General Household [Dirt] [Soil][s]
 - f. Outdoor [dirt] [soil][s]
 - g. [Tough] [dirt] [soils] [stains]
 - h. [Tough] [Greasy] Dirt
 - i. [Tough] [Grease] [And] [&] [Grime]
 - j. Lime[scale]
 - k. Mineral Deposits
 - l. [Soap Scum] [&] [and] [Stains]
 - m. Toilet Ring[s]
 - n. [Toilet] Rust



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Optional General / Cleaning Claims for front or back panel (Continued)

- o. [Hard] Water Deposits
- p. Cleans [Garbage] [Trash] Can[s]
- q. Cleans Waste Receptacle[s]

83. (Approved Surfaces for Disinfecting, Sanitizing and Cleaning:)

- a. [Bath] Tub[s]
- b. [Imitation] [Cultured] [Synthetic] Marble
- c. Bathroom [Sink] [Countertop] [Counter] [Tile] [Floors] [Fixtures] [Appliances]
- d. Sealed Fiberglass [Doors] [Shelves] [Surfaces]
- e. Glass
- f. Plastic Laminate [Formica®]
- g. Glazed [Ceramic] Tile
- h. Glazed Porcelain [Tile]
- i. [Hard Surface] [Glazed Tile] Floors
- j. Non-Food Contact
- k. Nonporous [Hard] [Solid] Surfaces
- l. Toilet[s] [(Inside And Outside)]
- m. [Glass] Shower[s] [Stalls] [Doors]
- n. Doorknobs
- o. Stainless Steel
- p. Sealed Granite

84. Locations for Disinfecting, Sanitizing and Cleaning:

- a. Medical [Clinics] [Facilities]
- b. Hospitals
- c. Healthcare [Facilities]
- d. Nursing Homes
- e. Health Clubs
- f. Industrial Facilities
- g. Institutions
- h. Manufacturing [Facilities] [Plants]
- i. [Hotels] [Motels]
- j. Office Buildings
- k. Prisons
- l. Correctional [Facilities] [Institutes]
- m. Public Transportation
- n. Day Care Facilities
- o. Schools
- p. Colleges
- q. Universities
- r. Sports Facilities

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