

74771-3

5/8/2007

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

May 8, 2007

Robert M. Seilaty
Agent for Sensible Life Products
Toxcel, LLC
P.O. Box 363
7140 Heritage Village Plaza
Gainesville, VA 20156

Subject: Benefect® Botanical Daily Cleaner Disinfectant Spray
EPA Registration No.: 74771-3
Application Date: April 26, 2007
Receipt Date: April 27, 2007

Dear Mr. Seilaty,

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

Proposed Notification

- Add the alternate brand names 'Benefect® Botanical Daily Cleaner Disinfectant Spray' 'Benefect® Botanical Weekly Cleaner Disinfectant Spray' 'CleanWell Daily Cleaner' 'CleanWell Weekly Cleaner' and 'CleanWell Monthly Cleaner'

General Comments

Based on a review of the material submitted, the following comments apply:

The notification application is acceptable and a copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me by telephone at (703) 308-6422 or email at heyward.adam@epa.gov.

Sincerely,

Adam Heyward
Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510P)

CONCURRENCES

| | | | | | | | | |
|--------|------------|--|--|--|--|--|--|--|
| YMBOL | 7510P | | | | | | | |
| JRNAME | G. Heyward | | | | | | | |
| DATE | 5/8/07 | | | | | | | |

| | | | |
|--|---|---|-----------------------|
|  | United States Environmental Protection Agency Washington, DC 20460 | <input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other | OPP Identifier Number |
|--|---|---|-----------------------|

Application for Pesticide – Section 1

| | | |
|--|---|--|
| 1. Company/Product Number <div style="text-align: center; font-weight: bold;">74771-3</div> | 2. EPA Product Manager <div style="text-align: center; font-weight: bold;">A. Heyward</div> | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) Benefect® Botanical Daily Cleaner Disinfectant Spray | PM# | |
| 5. Name And Address Of Applicant (Include ZIP Code) Sensible Life Products (Div. of LBD Ltd.) 7 Innovation Drive, Suite 34 Flamborough, Ontario L9H 7H9 <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

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

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

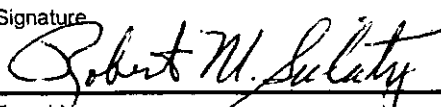
Notification of alternate brand names and use of graphics for "Benefect® Botanical Daily Cleaner Disinfectant Spray", "Benefect® Botanical Weekly Cleaner Disinfectant Spray", "Benefect® Botanical Monthly Cleaner Disinfectant Spray", "CleanWell™ Daily Cleaner", "CleanWell™ Weekly Cleaner" and "CleanWell™ Monthly Cleaner".

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: | | | |
| 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 | 2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____ |
| * Certification must be submitted If "Yes" No. per Unit Packaging wgt. Container | | If "Yes" No. per Unit Packaging wgt. Container | |
| 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"/> Lithographed <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled | |

Section IV

| | | | |
|---|---|--|--|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) | | | |
| Name <div style="text-align: center; font-weight: bold;">Robert M. Sielaty</div> | Title <div style="text-align: center;">Authorized Representative (ToXcel, LLC)</div> | Telephone No. (Include Area Code) <div style="text-align: center;">(703) 335-5670</div> | |
| 2. Signature  | | | 3. Title <div style="text-align: center;">Authorized Representative (ToXcel, LLC)</div> |
| 4. Typed Name <div style="text-align: center; font-weight: bold;">Robert M. Sielaty</div> | | 5. Date <div style="text-align: center; font-size: 1.2em;">4/27/07</div> | |
| 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 |

toXcel**Toxicology & Regulatory Affairs**

P.O. Box 363

7140 Heritage Village Plaza

Gainesville, VA 20156

USA

Phone: (703) 335-5670

Fax: (703) 310-6950

HAND-DELIVER

April 26, 2007

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

RE: Notification of Alternate Brand Names and Graphics per PR Notice 98-10
for **Benefect® Botanical Daily Cleaner Disinfectant Spray**
(EPA Reg. No. 74771-3)

Dear Sir/Madam:

On behalf of Sensible Life Products of Ontario, Canada, we are submitting sub-labels with alternate brand names and use of graphics displaying application patterns for the above-named product, for which a Master Label was approved on February 6, 2007.

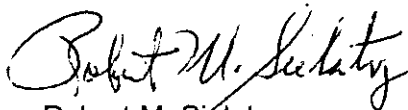
Enclosed is an Application (EPA Form 8570-1) and labels for each of the alternate products, as follows:

Benefect® Botanical Daily Cleaner Disinfectant Spray
Benefect® Botanical Weekly Cleaner Disinfectant Spray
Benefect® Botanical Monthly Cleaner Disinfectant Spray
CleanWell™ Daily Cleaner
CleanWell™ Weekly Cleaner
CleanWell™ Monthly Cleaner

We request to be informed of the acceptance of this notification in accordance with the provisions of PR 98-10, by an email to rsielaty@toxcel.com.

Please contact me immediately if you have any questions regarding this notification.

Sincerely,



Robert M. Sielaty
Authorized Representative for Sensible Life Products

cc: Adam Heyward
Sam DeAth

NOTIFICATION
 Date Reviewed: 5-8-07
 Reviewed By: F. Green



A gentle wipe for quick and easy cleaning throughout the home on countertops, tabletops, sinks, appliances, toys, changing tables, cribs, windows and more.

Clean easy, breathe easy. CleanWell with Ingenium is a botanical limited disinfectant cleaner made with pure plant extracts. *The patented technology is proven to kill 99.99% of household germs, specifically Influenza A, Staphylococcus aureus, Salmonella enterica, Pseudomonas aeruginosa, and Escherichia coli.

Antibacterial Cleaner

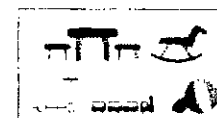
WITH **INGENIUM**™

Kills 99.99% of germs* naturally on hard non-porous surfaces



SUITABLE FOR use on hard, non-porous surfaces in residential and commercial applications, including: kitchens, restaurants, bars, day care facilities, nurseries, kennels, gyms, spas, schools, and hotels.

SUITABLE FOR use on all hard, non-porous surfaces where bacteria or unpleasant odors are a concern.



Visit www.cleanwelltoday.com



Part of a Sustainable Solution



Please recycle container

CLEANER • DECONTAMINANT • DEODORIZER

30 MOUNTAIN VIEWS
 100% Natural Ingredients

ACTIVE INGREDIENTS
 10% (provides a combination of 10% active ingredients)
 Other Ingredients 90%
 Total 100%

INGENIUM™
 100% Natural Ingredients
 100% Natural Ingredients
 100% Natural Ingredients

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For heavily soiled or greasy areas, pre-cleaning is required.
TO CLEAN: Wipe the surface and wipe clean. For stubborn stains, let stand for a few minutes.
TO DISINFECT: Wipe the surface with wipe. 2. Leave visibly wet for 10 minutes. Allow to air-dry. No rinsing or wiping is required, except on direct food contact surfaces, which require a potable water rinse after treatment.
STORAGE/DISPOSAL: Store in original container in a cool, dry place. Do not use if the container is damaged. Dispose of wipe in trash for compost after use.

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NOTIFICATION
 Date Reviewed: 5-4-07
 Reviewed By: H. G. R. H. H.

WEEKLY CLEANING WIPES

**Clean
Well™**

**Clean
Well™**

WEEKLY STRENGTH CLEANING WIPES

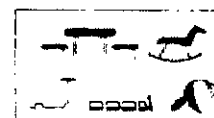
A textured wipe for thorough cleaning throughout the home and tougher stains on sinks, countertops, glazed tiles, stovetops, toilet seats, floors and more.

Clean easy, breathe easy. CleanWell with Ingenium is a botanical limited disinfectant cleaner made with pure plant extracts. *The patented technology is proven to kill 99.99% of household germs, specifically Influenza A, Staphylococcus aureus, Salmonella enterica, Pseudomonas aeruginosa, and Escherichia coli.

Antibacterial Cleaner

INGENIUM™

Kills 99.99% of germs* naturally
 on hard non-porous surfaces



Visit www.cleanwelltoday.com



Part of a
Sustainable Solution



Please recycle
container

CLEANER • DECONTAMINANT • DEODORIZER

30 MOIST WIPES

10.5" x 7.5" x 0.001" (30 Wipes)

ACTIVE INGREDIENTS

Thymol (present as a component of Thyme Oil) 0.05%
 Other Ingredients 99.95%
 Total 100%

KEEP OUT OF REACH OF CHILDREN

EPA Reg. No. 34771-3
 EPA Est. No. 075233 (CAN. 01)

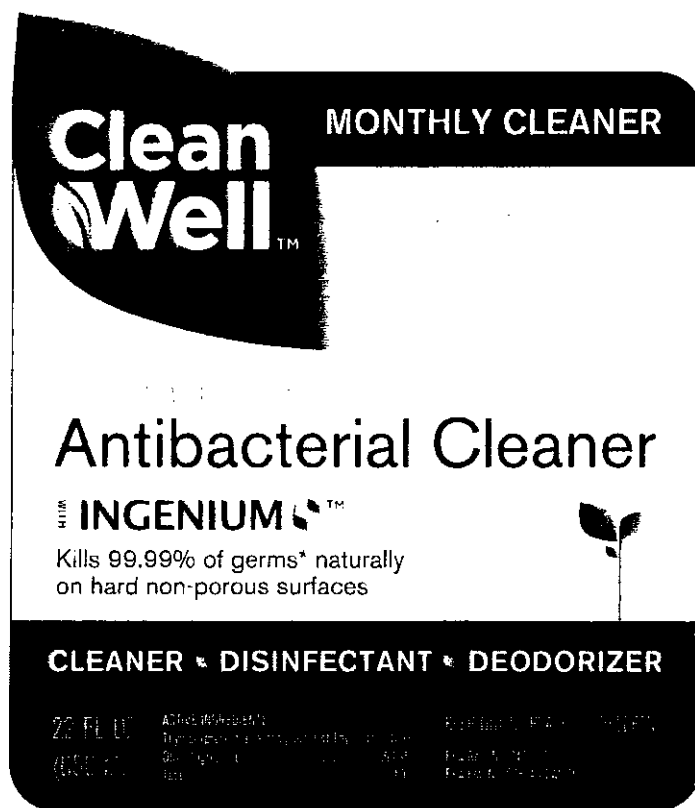
DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For heavily soiled or greasy areas, pre-cleaning is required.
TO CLEAN: Wet the surface and wipe clean. For stubborn stains, let stand for a few minutes.
TO DISINFECT: Wet the surface with wipe. 2. Leave visibly wet for 10 minutes. Allow to air-dry. No rinsing or wiping is required, except on direct food contact surfaces which require a potable water rinse after treatment.
STORAGE/DISPOSAL: Store airtight at room temperature – reseal container between uses. No special handling is required. Dispose of wipe in trash (or compost) after use.

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Questions? 1 800 507 9395

5/8

6/8



MONTHLY STRENGTH CLEANER

Disinfect while you clean – A penetrating foam for intensive cleaning throughout the home.

Antibacterial Cleaner

Clean easy, breathe easy. CleanWell with Ingenium is a botanical disinfectant cleaner made with pure plant extracts. *The patented technology is proven to kill 99.99% of household germs, specifically Influenza A, Staphylococcus aureus, Salmonella enterica, Pseudomonas aeruginosa, and Escherichia coli.

SUITABLE FOR use on hard, non-porous surfaces in residential and commercial applications, including: kitchens, restaurants, bars, day care facilities, nurseries, kennels, gyms, spas, schools, and hotels

SUITABLE FOR use on all hard, non-porous surfaces where bacteria or unpleasant odors are a concern.



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DAILY STRENGTH CLEANER

WITH **INGENIUM™**

ALL-PURPOSE Antibacterial Cleaner

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For heavily soiled or greasy areas, pre-cleaning is required.

TO CLEAN: Spray surface, allow foam to penetrate, then wipe clean. For stubborn stains, let stand for a few minutes

TO DISINFECT: 1. Spray surface. 2. Leave for 10 minutes. Allow to air-dry. No rinsing or wiping is required, except on direct food contact surfaces which require a potable water rinse after treatment.

STORAGE/DISPOSAL: Store airtight at room temperature. Waste resulting from the use of this product may be poured down the drain. No special handling is required. Please recycle empty container.



Part of a Sustainable Solution

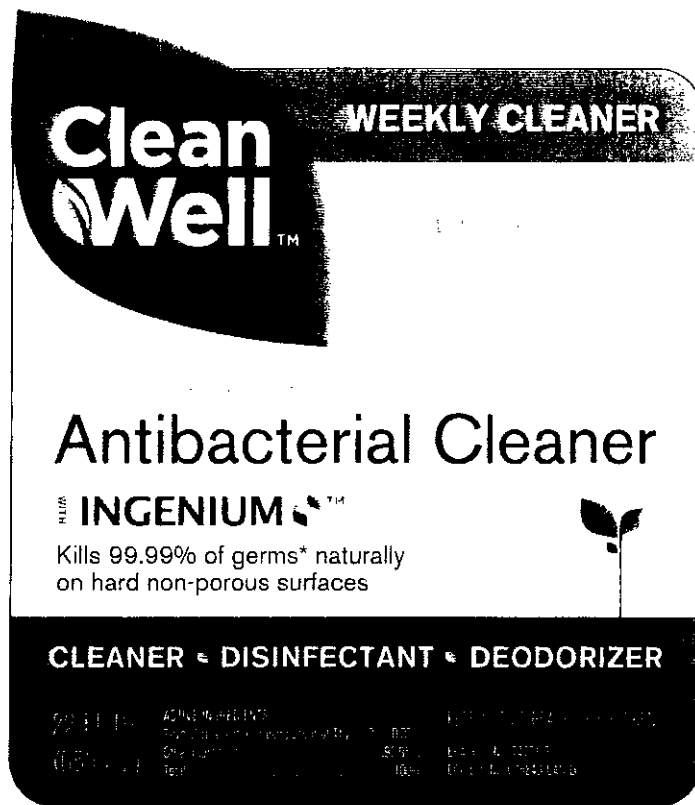


Please recycle container

Visit www.cleanwelltoday.com

Questions? 1-800-507-9111

7/8



WEEKLY STRENGTH CLEANER

Disinfect while you clean – A powerful spray for thorough cleaning throughout the home

Antibacterial Cleaner

Clean easy. breathe easy. CleanWell with Ingenium is a botanical disinfectant cleaner made with pure plant extracts. *The patented technology is proven to kill 99.99% of household germs, specifically Influenza A, Staphylococcus aureus, Salmonella enterica, Pseudomonas aeruginosa, and Escherichia coli.

SUITABLE FOR use on hard, non-porous surfaces in residential and commercial applications, including: kitchens, restaurants, bars, day care facilities, nurseries, kennels, gyms, spas, schools, and hotels.

SUITABLE FOR use on all hard, non-porous surfaces where bacteria or unpleasant odors are a concern.

© 2007 Simbio Life Products, Inc. (800) 444-2444 • 100% Natural • 100% Biodegradable • 100% Safe • 100% Effective

DAILY STRENGTH CLEANER

INGENIUM

ALL-PURPOSE Antibacterial Cleaner

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For heavily soiled or greasy areas, pre-cleaning is required.

TO CLEAN: Wet the surface and wipe clean. For stubborn stains, let stand for a few minutes

TO DISINFECT: 1. Wet the surface. 2. Leave for 10 minutes. Allow to air-dry. No rinsing or wiping is required, except on direct contact surfaces which require a potable water rinse after treatment.

STORAGE/DISPOSAL: Store airtight at room temperature. Waste resulting from the use of this product may be poured down the drain. No special handling is required. Please recycle empty container.

Part of a Sustainable Solution
 Please recycle container

Visit www.cleanwellday.com Questions? 1 800 507 9355



Antibacterial Cleaner

INGENIUM™


Kills 99.99% of germs* naturally
on hard non-porous surfaces

CLEANER • DISINFECTANT • DEODORIZER

22 FL OZ
(650 ML)

ACTIVE INGREDIENTS:
Thymol (present as a component of Thyme Oil) 0.05%
Other Ingredients 99.95%
Total 100%

KEEP OUT OF REACH OF CHILDREN
EPA Reg. No. 74771-3
EPA Est. No. 076840-CAN-001




Disinfect while you clean – A streak-free spray for quick & easy cleaning throughout the home.

Antibacterial Cleaner


Clean easy breathe easy CleanWell with Ingenium is a botanical disinfectant cleaner made with pure plant extracts. *The patented technology is proven to kill 99.99% of household germs, specifically Influenza A, Staphylococcus aureus, Salmonella enterica, Pseudomonas aeruginosa, and Escherichia coli.

SUITABLE FOR use on hard, non-porous surfaces in residential and commercial applications, including: kitchens, restaurants, bars, day care facilities, nurseries, kennels, gyms, spas, schools, and hotels.

SUITABLE FOR use on all hard, non-porous surfaces where bacteria or unpleasant odors are a concern.



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DAILY STRENGTH CLEANER

INGENIUM™


ALL-PURPOSE Antibacterial Cleaner

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For heavily soiled or greasy areas, pre-cleaning is required.


TO CLEAN: Wet the surface and wipe clean. For stubborn stains, let stand for a few minutes.

TO DISINFECT: 1. Wet the surface. 2. Leave for 10 minutes. Allow to air-dry. No rinsing or wiping is required, except on direct food contact surfaces which require a potable water rinse after treatment.

STORAGE/DISPOSAL: Store airtight at room temperature. Waste resulting from the use of this product may be poured down the drain. No special handling is required. Please recycle empty container.



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Please recycle container

Visit www.cleanwelltoday.com

Question? 1 800 507 825