

74771-4

5/8/2007

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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 Towelette
 EPA Registration No.: 74771-4
 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 Towelette' 'Benefect® Botanical Weekly Cleaner Disinfectant Towelette' 'CleanWell Daily Cleaning Wipes' and 'CleanWell Weekly Cleaning Wipes'

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,


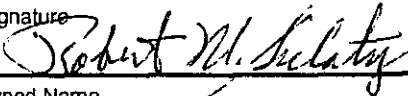


Adam Heyward
 Product Manager (34)
 Regulatory Management Branch II
 Antimicrobials Division (7510P)

CONCURRENCES

SYMBOL	7510P						
JRNAME	G. Seilaty						
DATE	5/8/07						

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	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 74771-4		2. EPA Product Manager A. Heyward	
4. Company/Product (Name) Benefect® Botanical Daily Cleaner Disinfectant Towelette		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
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		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 _____	
<input type="checkbox"/> Check if this is a new address.			
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.) Notification of alternate brand names and use of graphics for "Benefect® Botanical Daily Cleaner Disinfectant Towelette", "Benefect® Botanical Weekly Cleaner Disinfectant Towelette", "CleanWell™ Daily Cleaning Wipes", and "CleanWell™ Weekly Cleaning Wipes". 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			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithographed <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
Section IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Robert M. Sielaty		Title Authorized Representative (ToXcel, LLC)	Telephone No. (Include Area Code) (703) 335-5670
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
2. Signature 		3. Title Authorized Representative (ToXcel, LLC)	
4. Typed Name Robert M. Sielaty		5. Date 4/27/07	

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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 Towelette**
(EPA Reg. No. 74771-4)

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 Towelette
Benefect® Botanical Weekly Cleaner Disinfectant Towelette
CleanWell™ Daily Cleaning Wipes
CleanWell™ Weekly Cleaning Wipes

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

{This is the product name for the Alternate formulation.}

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NOTIFICATION
Date Reviewed: 5-5-07
Reviewed By: J. G. [unclear]

Benefect® Botanical Weekly Cleaner Disinfectant Towelette

Botanical

Textured Wipe for thorough cleaning and tougher stains
Kills over 99.99% of germs on hard, non-porous surfaces

Decontaminant
Cleaner
Deodorizer
Bactericidal
Virucidal against Influenza A

Active Ingredients:

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

Net Contents: [6] [10] [12] [15] [20] [25] [30] [35] [70] [80] [100]
[Pouch] [Canister] [Box]
[6" x 8"] [3.5" x 8"] [7" x 8"] [7" x 9"]

Keep Out of the Reach of Children

Citrus Spice Scent

EPA Reg. No. 74771-4
EPA Est. No. 075840-CAN-001

Benefect is a botanical disinfectant cleaner made from plant extracts. The patented technology is proven to kill over 99.99% of germs, specifically Salmonella enterica, Pseudomonas aeruginosa, and Influenza A (tested in the presence of 5% organic soil load). Benefect also effectively controls odors produced by these microorganisms on non-porous surfaces.

Part of our Sustainable Botanical Cleaning & Disinfection Solution. Contains non-VOC emitting ingredients. No fine print.

SUITABLE FOR use on hard, non-porous surfaces in residential, commercial or medical applications, including:

- | | |
|---|-----------------------------|
| Health care facilities | Food preparation facilities |
| Hospitals | Nursing homes |
| Medical, veterinary & dental offices | Day care facilities |
| Health professional, chiropractic & physiotherapy clinics | Nurseries |
| Kitchens, cafeterias, food storage areas | Restaurants & bars |
| Schools | Fitness gyms, spas |
| Zoos & kennels | Hotels & motels |

This product is not to be used as a terminal sterilant/high level disinfectant on any surface or instrument that (1) is introduced directly into the human body, either into or in contact with the bloodstream or normally sterile areas of the body, or (2) contacts intact mucous membranes but which does not ordinarily penetrate the blood barrier or otherwise enter normally sterile areas of the body. This product may be used to preclean or decontaminate critical or semi-critical medical devices prior to sterilization or high level disinfection.

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

- | | |
|--|--------------------------|
| Countertops | Walls |
| Food preparation surfaces | Toilet seats |
| Pet habitats | Garbage cans |
| Children's toys | Highchairs |
| Floors | Boat surfaces & cavities |
| Changing tables | Prostheses & orthotics |
| Sports equipment such as jock cups & helmets | Sinks |
| Construction materials such as water damaged sheet metal | |

Any other hard non-porous surface where bacteria or unpleasant odors are a concern.

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

TO CLEAN: 1. Wet the surface with the wipe & wipe clean. For stubborn stains, let stand for a few minutes.

TO DISINFECT: 1. Wet the surface with the wipe (spot test to check surface compatibility). 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.

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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. Please recycle empty container.

Patented Internationally
Sensible Life Products (div of LBD Ltd)
34-7 Innovation Dr. ON, CA L9H 7H9
www.Benefect.com (800) 909-2813

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Benefect[®] Botanical Daily Cleaner Disinfectant Towelette

Botanical
Gentle Wipe for quick cleaning
Kills over 99.99% of germs on hard, non-porous surfaces

Decontaminant
Cleaner
Deodorizer
Bactericidal
Virucidal against Influenza A

NOTIFICATION
Date Reviewed: 5-8-07
Reviewed By: AGraham

Active Ingredients:

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

Net Contents: [6] [10] [12] [15] [20] [25] [30] [35] [70] [80] [100]
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- | | |
|---|-----------------------------|
| Health care facilities | Food preparation facilities |
| Hospitals | Nursing homes |
| Medical, veterinary & dental offices | Day care facilities |
| Health professional, chiropractic & physiotherapy clinics | Nurseries |
| Kitchens, cafeterias, food storage areas | Restaurants & bars |
| Schools | Fitness gyms, spas |
| Zoos & kennels | Hotels & motels |

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

- | | |
|--|--------------------------|
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| Food preparation surfaces | Toilet seats |
| Pet habitats | Garbage cans |
| Children's toys | Highchairs |
| Floors | Boat surfaces & cavities |
| Changing tables | Prostheses & orthotics |
| Sports equipment such as jock cups & helmets | Sinks |
| Construction materials such as water damaged sheet metal | |

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Patented Internationally
Sensible Life Products (div of LBD Ltd)
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