Ana Rodriguez-Koster Agent for Wet & Forget USA, Ltd. Lewis and Harrison 122 C Street, N.W., Suite 740 Washington, DC 20001

SUBJECT:

Wet & Forget

EPA Registration Number: 84115-1 Application Date: July 19, 2011 Receipt Date: July 20, 2011

AUG 1 1 2011

Dear Ms. Rodriguez-Koster:

This letter acknowledges receipt of the notification identified above submitted under the provisions of the Federal Insecticide, Fungicide, and Rodenticide Act (FIRRA), as amended and PR Notice 98-10.

Notification to add following information to the Master Label:

References to additional container size (43 ounces) and other associated language

Based on a review of the submitted information this notification is acceptable. This notification will be made part of the record for this file.

#### **General Comments**

Should you have any questions concerning this letter, please contact Tracy Lantz at (703) 308-6415.

Sincerely,

Velma Noble.

Product Manager (31).

Regulatory management Branch I. Antimicrobials Division (7510P)

T.Lantz:8/11/11:84115-1a notification CONCURRENCES OFFICIAL FILE COP EPA Form 1320-1A (1/90)

Printed on Recycled Paper

United States Environmental Protection Agency Washington, DC 20460    Amendment	ease read instructions on reverse befo pires 05-31-98	ore comple form.	m Approved, OMB No. 2070-0060, Approval						
1. Company/Product Number 8441-94 441	₽ EDA	United States  Environmental Protection A			dment	OPP Identifier Number 265394			
Velma Noble   None   Re   None   None   Re   None		Applica	tion for Pes	sticide - Section	on I				
Team 31  Team 31  Team 31  S. Expedited Review. In accordance with FIFRA Section 3(c) (b)(l), my product is similar or identical in composition and laber to the forest USA Ltd.  (b)(l), my product is similar or identical in composition and laber to the very sealand of the very sealand				Proposed Classification					
is. Name and Address of Applicant (Include ZIP Code)  Wat & Forget USA Ltd. 2. O. Box 100-95 2. O. Box 100-95 3. O. Box 100-95 3. O. Box 100-95 3. O. Box 100-95 4. O. Box 100-9			None Restrict						
Amendment - Explain below.	Wet & Forget USA Ltd. P. O. Box 100-959 North Shore Mail Center New Zealand PLEASE DIRECT ALL COR "CONTACT POINT" L	(b)(l), m to: EPA Re	Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labelin to:  EPA Reg. No						
Amendment — Explain below.  Resubmission in response to Agency letter dated	Check if this is a new ac	duress	Contin	n II					
Section - III  1. Material This Product Will Be Packaged In: Child-Resistant Packaging Unit Packaging Yes* Yes Metal No No Packaging Water Soluble Packaging Yes Metal Plastic: If "Yes" No. per Container Container Packaging Wgt. Vol. per Container Package wgt. No. per Container Other (Specify)  3. Location of Net Contents Information Label Container Stenciled Section - IV  1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)  Section - IV  1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)  Title: Agent for Wet & Forget USA Ltd. Title: Agent for Wet & Forget USA Ltd. Title: Agent for Wet & Forget USA Ltd. Title: Onlact Point (202) 392-3903 ext.  Total This Product Will Be Packaged In:  Water Soluble Packaging 2. Type of Container Metal  Plastic: If "Yes" No. per Container Paper Glass  On Label On Label Directions On Label 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)  Title: Agent for Wet & Forget USA Ltd. Title: Agent for Wet & Forget USA Ltd. Total Title: Agent for Wet & Forget USA Ltd. Total Title: Agent for Wet & Forget USA Ltd. Total Title: Agent for Wet & Forget USA Ltd.	Notification - Explain below.  Explanation: Use additional  Notification: Use additional  This notification is consistent with the labeling or the confidential state statement to EPA. I further undersibe in violation of EIFRA and I may be	page(s) if necessary  TIFICATION OF MIN  Notification of MINOR Land the provisions of PR Notice  Tement of formula of this part of the provision of the provisi	OR LABEL ( ABELCHANGES a 98-10 and EP/ roduct. I unders n is not consiste ent action and p	Other - Explain on I and Section on I and Section on I and Section of I and Section of I and Section of I and Section of I and	PR-NOTICE Sth PR Notice 98-CFR 152.46, and ation of 18 U.S.C. PR Notice 95-2 and 14 of 19 U.S.C. PR Notice 95-2 and 14 of	no other changes have been made Sec 1001 to willfully make any fa and 40 CFR 152.46, this product m			
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Child-Resistant Packaging	Material This Product Will Be Page	ckaged In:	000110						
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Paper glued Stenciled  Section - IV  1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)  Name: Ana Rodriguez-Koster, Lewis and Harrison, LLC 122 C St., NW Suite 740  Title: Agent for Wet & Forget USA Ltd.  Title: Agent for Wet & Forget USA Ltd.  Tode): (202) 390-3903 ext.	Location of Net Contents Information     4. Size(s) Retains			er	of Label Directions el				
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122 C St., NW Suite 740 Code): (202) 390-3903 ext.	1. Contact Point (Complete items di	rectly below for identificat	ion of individual	to be contacted, if n	ecessary, to proce	ess this application)			
A C	122 C St., NW Suite 740	itle: Agent for V	Vet & Forget USA L	Telephone No. (Include Area Code): (202) 390-3903 ext. 17					
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.  2/Signature  3. Title: Wet & Forget USA Ltd.	I certify that the statements I have n acknowledge that any knowingly fals under applicable law.	nade on this form and all a se or misleading statemer	attachments the nt may be punish	nable by fine or impri	te and complete. sonment or both	6. Date Application Received (Stamped)			

5. Date

7/19/2011

4. Typed Name / Ana Rodriguez-Koster, Lewis & Harrison LLC

Cocc

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o EDA	_	Regis			OPP Identifier Number				
Environmental Protection Ager Washington, DC 20460				Amend Other		nent 265394			
		Application	on for Pestic	ide - Section	l				
1. Company/Product Number			2. EPA	2. EPA Product Manager			3. Proposed Classification		
4. Company/Product (Name)			PM#		aritin	<b>- </b> L	None Restricted		
5. Name and Address of App	plicant (Include ZIP Co	dej	(b)(i), to: EPA	my product is sin	nilar or identi	cal in co	FIFRA Section 3(c)(3) mposition and labeling		
Check if this	is a new address		,	uct Name					
			Section -	11			· '		
Amendment - Explain below.  Resubmission in response to Agency letter dated  Notification - Explain below.				Final printed labels in repsonse to Agency letter dated "Me Too" Application.  Other - Explain below.					
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* Certification must be submitted	If "Yes" Unit Packaging wgt.	No. per container	if "Yes" Package wgt	No. per container	***************************************	Paper Other (5	Specify)		
3. Location of Net Contents  Label	Information Container	4. Size(s) Re	tail Container	5. L	ocation of Labo	ol Directio	ons ·		
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5. Date

4. Typed Name

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122 C Street, N.W., Suite 740 Washington, D.C. 20001

telephone 202.393.3903 fax 202.393 3906

Consultants in Government Affairs

July 19, 2011

**VIA FEDERAL EXPRESS** 

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:

Velma Noble

**Product Manager, Team 31** 

SUBJECT:

Wet & Forget USA Ltd.

WET & FORGET (EPA Reg. No. 84115-1)

Notification of Minor Label Changes per PR Notice 98-10

Dear Ms. Noble:

On behalf Wet & Forget USA Ltd., I am submitting a Notification of minor label changes for their end-use product, **WET & FORGET (EPA Reg. No. 84115-1)**. The purpose of this Notification is to add some optional non-pesticidal marketing language to the product's label. I'm also taking this opportunity to add an additional container size to the product's file.

Please note that all additions / revisions involve no changes to the ingredients statement, signal word, use classification, precautionary statements, first aid, use directions, physical/chemical properties, or storage and disposal language. Furthermore, the additions / revisions do not substitute for or conflict with label text, and are not false or misleading.

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

- Application for Pesticide Notification (OPP ID No. 265394), which includes a signed statement certifying compliance with PR Notice 98-10;
- 2. One (1) copy of the proposed product labeling, with changes highlighted; and,
- 3. One (1) clean copy of the proposed product labeling.

Thank you for your assistance with this submission. If you have any questions, please call me at 202-393-3903 x.17 or e-mail me at alkoster@lewisharrison.com.

Sincerely,

Ana Rodriguez-Koster

Agent for Wet & Forget USA Ltd.

**Enclosures** 

CC:

Brett Perry, Wet & Forget Inc.

are Rodriguez-Koter

## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**DANGER.** Corrosive. Causes irreversible eye damage and skin burns. Harmful if swallowed or absorbed through the skin. Do not get in eyes, on skin, or on clothing. Wear protective eyewear (safety glasses or face shield), protective clothing, and rubber gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse. Avoid contamination of food. Avoid breathing spray mist.

#### Personal Protective Equipment (PPE)

Applicators and other handlers must wear protective eyewear, long pants and long-sleeved shirt, shoes plus socks and chemical-resistant gloves. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

#### **User Safety Recommendations**

Users should:

- Wash hands before drinking, eating, chewing gum, using tobacco or using the toilet.
- Remove PPE clothing immediately if the pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

#### **ENVIRONMENTAL HAZARDS**

This pesticide is toxic to fish and aquatic invertebrates. 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.

### **WET & FORGET**

# **DANGER**

See [right] [left] [side] [inside] [back] panel [label] for Precautionary Statements [and First Aid]

#### **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 eye. Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING: Remove contaminated clothing. Rinse skin immediately with plenty of water for 15 – 20 minutes. Call a poison control center or doctor for treatment advice.

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

**IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. 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. In case of transport or medical emergency, call CHEMTREC at 1-800-424-9300.

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.

EPA Reg. No. 84115-1 EPA Est. No. (insert Est. No. here) NET CONTENTS: [Half Gallon] [0.75 Gallons] [1.32 Gallons] [1 Gallon]

[Manufactured by:] [Manufactured for:] [Distributed by:]

Wet & Forget USA Ltd. P. O. Box 100-959 North Shore Meil Center New Zealand

20-959 Éil Certter

WET & FORGET EPA Reg. No. 84115-1 LABEL PER EPA Notification dated 7/19/2011 (Note to reviewer: Language in [ ] is optional or interchangeable)

For use on [sealed] concrete, [non-porous] pool surroundings, patio furniture (except cushions and wood frames), [sealed] natural stone, [sealed] tombstones, roofs (asphalt and fiberglass shingles, color steel, [sealed] clay and concrete tiles), [sealed] [non-grass] tennis courts, astro turf (artificial turf), [glazed] ceramic pots, asphalt driveways, painted [non-porous] surfaces, siding (vinyl, aluminum), [non-porous] textured finishes, play equipment (slides, plastic gyms), wood decks, golf tees and greens, and as a spot treatment in residential lawns.

**HOW IT WORKS:** Once WET & FORGET has killed the moss, mold, algae and/or mildew growth, it relies on the elements to remove the stains. If the surface to be treated is not fully exposed to rainfall or is vertical, some assistance may be required to remove the stains.

#### **DIRECTIONS FOR USE**

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

TO [REMOVE] [KILL] MOSS, MOLD, ALGAE, AND MILDEW: Mix 13 oz. WET & FORGET per 5 gallons of water. Apply use solution to areas infested with moss, mold, algae, or mildew with a [pump up] [garden] sprayer until surface is thoroughly saturated. Let stand 10 minutes and allow to air dry. Do not employ equipment until treatment has been absorbed, dried, or set. For heavy infestations, [wash off] [remove] dead moss, mold, mildew, algae 12 to 24 hours later with another application of WET & FORGET.

WET& FORGET is best applied in overcast dry conditions to avoid rapid evaporation. Do not apply if heavy rain is expected within 4-5 hours.

**REACTION TIME:** Once treated with WET & FORGET [growth] [stains] may take up to 6 -12 months to come clean in the [very] worst case scenario. It is very important that the mixing instructions are followed.

**MAINTENANCE:** Repeat application once a year or when new [growth] [stains] [appears] [returns]. Do not repeat treatment more than 6 times per year.

**WOOD DECKS:** Follow mixing directions. Stains in Cedar or Redwood may require brushing for full stain removal. Use water and hard broom 1 month after application. Once cleaned, it may be maintained with WET & FORGET to prevent [growth] [stains].

**GOLF GREENS & TEES:** Spray a solution of 1.3 oz. of WET & FORGET per 5 gallons of water until surface is thoroughly saturated. If necessary, repeat spray applications after 10 days. Treatment is not to exceed 10 acres (2,000 gallons). Do not repeat treatment more than 6 times per year.

**RESIDENTIAL LAWNS/TURF:** Use WET & FORGET as a spot treatment on areas affected by moss or algal growth/stains. Spray a solution of 5.1 oz. WET & FORGET per 5 gallons of water until surface is thoroughly saturated. If necessary, repeat spray applications after 10 days. Treatment is not to exceed 25 gallons per 1000 sq. feet. Do not repeat treatment more than 6 times per year.

TO REMOVE MOSS, MOLD, ALGAE, AND MILDEW STAINS: Mix 1 part WET & FORGET to 5 parts water. Apply use solution with a [pump up] [garden] sprayer until [dry] surface is thoroughly saturated. [Let stand 10 minutes and] Allow to air dry. A second application 1-2 months after the first may also assist when treating persistent stains. Do not repeat treatment more than 6 times per year.

**PLAY EQUIPMENT:** Do not allow children on play equipment (i.e., slides, plastic gyms), if it has been treated with WET & FORGET, until the equipment has been washed down with fresh water, a day after application.

**PETS:** Keep animals off treated surfaces until product has dried. If contamination occurs, rinse animal's paws with fresh water to prevent animal licking WET & FORGET.

**PLANTS:** Do not spray directly on to plants. Flush with fresh water if accidentally sprayed.

**FOR ALL APPLICATIONS:** Treatment must be performed at least 100 ft. from any pond, lake, stream, or river to prevent possible runoff into waterways.

#### Optional Pesticidal Claims:

- Moss, Mold Mildew & Algae Remover
- Kills Moss, Mold, Mildew & Algae

#### Optional Non-pesticidal Claims:

- [Removes Moss, Mold Mildew & Algae stains from:] [Exterior Surfaces on which you can use WET & FORGET:] [\*][sealed] concrete, [non-porous] pool surroundings, patio furniture (except cushions and wood frames), [sealed] natural stone, [sealed] tombstones, roofs (asphalt and fiberglass shingles, color steel, [sealed] clay and concrete tiles), [sealed] [non-grass] tennis courts, astro turf (artificial turf), [glazed] ceramic pots, asphalt driveways, glass houses, painted [non-porous] surfaces, siding (vinyl, aluminum), [non-porous] textured finishes, and play equipment (slides, plastic gyms), canvas awnings, yatch dodgers, wood decks, golf tees and greens, and as a spot treatment in residential lawns.
- Note to Review: This statement will be used on labels that only include instructions for stain cleaning/removal: [[Coverage: (375 – 1125) (550 – 1700) (750 – 2250) (250 – 750) sq feet depending on porosity and amount of staining.]
- [Cleans exterior surfaces\* with] No pressurewashing or scrubbing required.
- Apply with [normal] [pump up] garden sprayer.
- [Non-Caustic] [Non-Acidic] [No Bleach]
- Moss, Mold, Mildew [&] [and] Algae Stain Remover
- [Half Gallon Concentrate] [0.75 Gallons Concentrate] [One gallon concentrate] [43 oz. concentrate]
- Note to Review: This statement will be used on labels that only include instructions for stain cleaning/removal: [Makes 3 Gallons] [Makes 4.5 Gallons] [Makes 6 Gallons] [Makes 2 gallons]
- Note to Review: This statement will be used on labels that only include instructions for stain cleaning/removal: [How it Works: Once treated with WET & FORGET, the surface requires no pressure washing, scrubbing, or rinsing. Just thoroughly wet the dry surface with WET & FORGET and then forget about it. The elements (wind and rain etc) will slowly wash off the stain.]
- Peel Here for Precautions & First Aid
- Visit www.wetandforget.com for more products by Wet & Forget USA Ltd.
- [Product Concentrate is] Made in New Zealand
- [Made in the USA]
- [Developed in New Zealand] [Made in the USA Under License]
- Toll Free: 888-727-8524
- www.wetandforget.com
- sales@wetandforget.com

(Note to reviewer: If container size is one gallon or less, the following Storage and Disposal directions will be used:)

#### STORAGE AND DISPOSAL

Store in original container in locked [storage] areas inaccessible to children and persons unfamiliar with its use. Nonrefillable container. Do not reuse or refill this container. [Wrap and] Discard in trash or offer for recycling, if available.

(Note to reviewer: If container size is greater than one gallon, the following Storage and Disposal directions will be used:)

#### STORAGE AND DISPOSAL

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

#### **PESTICIDE STORAGE**

Store in original container in locked storage areas inaccessible to children. Open dumping is prohibited. Do not reuse empty container.

#### 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 instruction, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for quidance.

#### **CONTAINER DISPOSAL**

[Plastic containers:] Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or incinerate, or if allowed by state and local authorities, burn. If burned, stay out of smoke.

[Metal Container:] Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling, if available or reconditioning, if appropriate or puncture and dispose of in a sanitary landfill, or dispose of by other procedures approved by state and local authorities.