

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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

August 17, 2018

Georgia Anastasiou Agent for Mint-X Corporation C/O Lewis & Harrison, LLC 2461 S. Clark St., Suite 710 Arlington, VA 22202

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 – Adding Marketing Claim "Strong Flex" Product Name: Mint-X® Multipurpose Flexible Plastic EPA Registration Number: 85589-1 Application Date: August 8, 2018 OPP Decision Number: 543403

Dear Ms. Anastasiou:

The U.S. Environmental Protection Agency (EPA) is in receipt of your application for notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Biopesticides and Pollution Prevention Division (BPPD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The labeling submitted with this application has been stamped "Notification" and will be placed in our records. You must submit one (1) copy of the final printed labeling with the modifications.

Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and is subject to review by the EPA. If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

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If you have any questions, please contact Gina Burnett of my team by phone at (703) 605-0513 or via email at <u>burnett.gina@epa.gov</u>.

Sincerely,

andrew E. Buycelow

Andrew Bryceland, Team Leader Biochemical Pesticides Branch Biopesticides and Pollution Prevention Division (7511P) Office of Pesticide Program

Enclosure

Master Label:

Mint-X® Multipurpose Flexible Plastic

Sub Label A: TRASH BAGS Sub Label B: COMMERCIAL WAREHOUSE STRETCH FILM Sub Label C: COMMERCIAL WAREHOUSE PALLET COVER

Alternate	Brand	Names:	

Mint-X® Trash Bags Mint-X® Stretch Film Mint-X® Pallet Cover HDX Tall Kitchen Drawstring Bags HDX Large Trash Drawstring Bags

Active Ingredients:

Methyl Salicylate*	0.288%
Corn Mint Oil*	0.288%
Camphor Oil*	0.184%
Eucalyptus Oil*	0.040%
Other Ingredients	<u>99.200%</u>
Total	100.000%

[*Botanically Derived (Active Ingredients)] or [*Plant based (Active Ingredients)]

KEEP OUT OF REACH OF CHILDREN

EPA Reg No. 85589-1 EPA Est. No.

Manufactured By: Mint-X Corporation 20-48 119th Street College Point, NY 11356

Questions? Comments? Please visit our website at <u>www.mint-x.com</u> or Call 877-646-8224

NOTIFICATION

85589-1

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

08/17/2018

Mint-X® Multipurpose Flexible Plastic Alternate Brand Names: Mint-X® Trash Bags, HDX Tall Kitchen Drawstring Bags, HDX Large Trash Drawstring Bags

Active Ingredients:	
Methyl Salicylate*	
Corn Mint Oil*	0.288%
Camphor Oil*	0.184%
Eucalyptus Oil*	0.040%
Other Ingredients	<u>99.200%</u>
Total	100.000%

[*Botanically Derived (Active Ingredients)] or [*Plant based (Active Ingredients)]

KEEP OUT OF REACH OF CHILDREN

EPA Reg No. 85589-1 EPA Est. No.

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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. For management of trash disposal to reduce Norway Rats and Raccoons from damaging garbage bags when left outdoors. When used indoors, Mint-X Trash Bags may be used as a typical household trash bag. Efficacy improves with repetitive use at same location as rats and raccoons learn to avoid Mint-X Trash Bags when used in and around the periphery of buildings, alleys or homes. Dispose of used trash bags as specified on this label.

Use this product as a typical trash bag.

[NOTE: To avoid danger of suffocation, keep all plastic bags away from babies and children. Do not use plastic bags in cribs, beds, [carriages] [strollers] or playpens.]

[Do not use for food storage]

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

Do not contaminate water, food, or feed by storage and disposal. Dispose of used trash bags in accordance with state, local and federal regulations as ordinary trash.

Optional User Tips for Trash Bags:

[For Optimal (Best) Results] [Optimal (Best) Practice Tips] [(User) Recommendations][Suggested User Tips]:

1. Mint-X Trash Bags become more effective with repetitive usage.

2. Use only Mint-X Trash Bags. Do not commingle with other non-Mint-X Trash Bags.

3. The mint scent of the Mint-X Trash Bags is strongest within 3-5 days of removing bags from box. For best results, the time from bag removal from box to trash pickup should not exceed 3-5 days. After 3-5 days, place trash into a "fresh" Mint-X Trash Bag prior to leaving outside for trash pickup.

4. Clean out any trash container or storage area before using Mint-X, as any food residue will still attract rodents.

For best results visit www.mint-x.com/best-practices or call 877 MINT BAG

Optional Marketing Statements for Trash Bags

- Rodent Repellent Trash Bags*
- Keep rodents away from your trash.*
- Rodent proof*
- Mint Rodent Block*
- Mint Rodent Shield*
- Rodent Barrier*
- *[effective against the] Norway Rat & Raccoon
- Reduces Rat Torn Bags
- Strong and Durable
- Outdoor Strength Bags
- Strength you can count on
- [The] Protective Power of Mint
- Repels Rats
- Rat Repellent
- Interferes with gnawing and chewing by rats of garbage bags
- Laboratory Studies Show Mint-X Trash Bags Reduce Rat Torn Bags
- No more outdoor mess
- [Contains] mint scent
- Mint Scented
- The secret is the Mint Scent of the Mint-X bags
- Easy twist tie closure
- Can Liners
- Tall Kitchen [Drawstring] Bags
- The Mint-X Rodent Repellent Trash Bags have been proven to reduce rat torn bags after 7 day period of usage.

- Large [Outdoor] Trash Bags
- Before (picture of rat eating from trash bag)
- After (picture of rat not eating from trash bags
- Raccoon Repellent Trash Bags
- Repels Raccoons
- No more Raccoon Torn Bags
- Reduces Raccoon Torn Bags
- Raccoon Repellent
- Raccoons will no longer tear through trash bags.
- Protect your trash from Raccoons
- Drawstring [Trash Bags]
- These [product name] [trash bags] are proven to prevent rat and Raccoon torn bags.
- Easy-tie trash bags
- EZ-Grab Dispenser
- *effective against the Norway Rat and Raccoons
- Drives Raccoons away from your trash.
- Keeps Raccoons away from your trash.
- Made in the USA
- Neutralizes Odors
- Repels Raccoons and Rodents*
- *[effective against the] Norway rat and Raccoons
- Open this box to Release the Power of Mint!
- Store box wherever you need a burst of minty freshness!
- Mint Infused
- Neutralizes the foul odor of trash
- It's not the strength. It's the Mint scent!
- Up to 20% thicker than most other Tall Kitchen Bags!
- For best results also use Mint-X [Trash Bags] Outdoor Drawstring Bags
- New! Stretchable Drawstring! ("New" will be used for 6 months)
- Stretches to fit the can!
- Grips the can!
- Grip-tight Drawstring!
- No-slip drawstring!
- Sure-Grip Drawstring!
- Mint Scented Drawstring
- Scented Drawstring
- No More Bags Slipping Into The Can!
- Strong Flex
- The Mint-X Story;
- After 40 years of manufacturing and supplying heavy duty trash bags to New York City's largest apartment buildings, the inventor of Mint-X was asked to help solve a problem for his biggest customer. "Can't you put something in your trash that keeps rodents away?" That one question inspired the creation of an effective alternative to standard trash bags. The infusion of essential oils that combine to form the special mint formula in Mint-X® trash bags smells pleasant to humans but is overwhelming to raccoons and rats because of the keens sense of smell.
- Great Quality. Great Price. Guaranteed.
- [Our] [We] guarantee [is our promise] that you'll be fully satisfied with the quality of every Great Value product. If for any reason you aren't happy, we'll replace it or return

your money. Whichever you prefer. All you need is the package [and the receipt]. [It's that simple. Guaranteed.] Tell us what you think 1-xxx-xxxx or online at xxxxx.com

- Mint-X Patented Technology

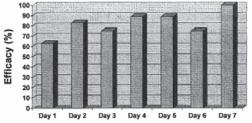


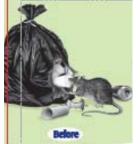






Laboratory Studies Show the effectiveness of the Mint-X Trash Bags at Reducing Rat Torn Bags.







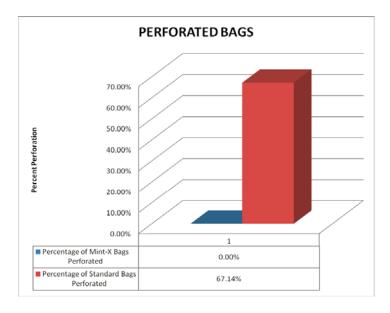
















Individual Bag Labeling



RODENT REPELLENT TRASH BAGS*

*effective against the Norway Rat and Raccoons

Active Ingredients: Methyl Salicylate.....0.288% Corn Mint Oil....0.288% Camphor Oil...0.184% Eucalyptus Oil...0.04% Other Ingredients...99.2% Total...100% EPA Reg. No. 85589-1 EPA Est. No. 85589-NJ-02 KEEP ALL PLASTIC BAGS OUT OF REACH OF CHILDREN. For additional information please see label on box.

U.S. Patent No. 7,811,597



Mint-X[®] *Multipurpose Flexible Plastic Alternate Brand Name:* Mint-X[®] Stretch Film

 Active Ingredients:
 0.288%

 Methyl Salicylate*
 0.288%

 Corn Mint Oil*
 0.288%

 Camphor Oil*
 0.184%

 Eucalyptus Oil*
 0.040%

 Other Ingredients
 99.200%

 Total
 100.000%

[*Botanically Derived (Active Ingredients)] or [*Plant based (Active Ingredients)]

KEEP OUT OF REACH OF CHILDREN

EPA Reg No. 85589-1 EPA Est. No.

Manufactured By: Mint-X Corporation 20-48 119th Street College Point, NY 11356

Questions? Comments? Please visit our website at <u>www.mint-x.com</u> or Call 877-646-8224

Directions for use:

It is a violation of Federal law to use this product that is inconsistent with its labeling. This product is intended to repel Norway Rats from the Mint- $X^{\mathbb{R}}$ Stretch Film resulting in undamaged and uncontaminated contents within the Film. Dispose of discarded Stretch Film as specified on this label. The Mint-X Stretch Film may be used in and around pallet storage areas. Mint- $X^{\mathbb{R}}$ Stretch Film can be used with standard manual wrapping devices as well as automatic pallet wrapping mechanisms.

Use this product as in the same manner as standard stretch film.

[NOTE: To avoid danger of suffocation, keep all loose plastic material away from babies and children.]

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

Do not contaminate water, food, or feed by storage and disposal. Dispose of used stretch film in accordance with state, local and federal regulations as ordinary trash.

Optional Marketing Statements for Stretch Film

- Rodent Repellent Stretch Film*
- Keeps rodents away from stretch film*
- Rodent Proof*
- Repels rodents from Stretch Film*
- Reduces rodent penetrations into palletized contents*
- Reduces the amount of items being contaminated by rodents*
- Prevents rodents from eating through the stretch film*
- Will keep the stretch film protected from rodents.*
- Will prevent rodents from eating into palletized cartons.* *effective against the Norway Rat
- Contains fresh mint scent
- Rat Repellent Stretch Film
- Improved stability or products or packages
- Enhanced efficiency in the handling and storage of unit loads
- Cost effective way to keep loads intact and sanitary.

Mint-X[®] Multipurpose Flexible Plastic Alternate Brand Name: Mint-X[®] Pallet Cover

Active Ingredients:	
Methyl Salicylate*	
Corn Mint Oil*	0.288%
Camphor Oil*	0.184%
Eucalyptus Oil*	0.040%
Other Ingredients	
Total	100.000%

[*Botanically Derived (Active Ingredients)] or [*Plant based (Active Ingredients)]

KEEP OUT OF REACH OF CHILDREN

EPA Reg No. 85589-1 EPA Est. No.

Manufactured By: Mint-X Corporation 20-48 119th Street College Point, NY 11356

Questions? Comments? Please visit our website at <u>www.mint-x.com</u> or Call 877-646-8224

Directions for use:

It is a violation of Federal law to use this product that is inconsistent with its labeling. This product is intended to repel Norway Rats from the Mint- $X^{\mathbb{R}}$ Pallet Cover resulting in undamaged and uncontaminated contents within the Cover. Dispose of discarded Pallet Cover as specified on this label. The Mint- $X^{\mathbb{R}}$ Pallet Cover may be used in and around pallet storage areas.

Use this product as in the same manner as a standard pallet cover.

[NOTE: To avoid danger of suffocation, keep all loose plastic material away from babies and children.]

Storage and Disposal:

Do not contaminate water, food, or feed by storage and disposal. Dispose of used pallet cover in accordance with state, local and federal regulations as ordinary trash.

Optional Marketing Statements for Pallet Cover

- Rodent Repellent Pallet Cover*
- Keeps rodents away from pallet cover*
- Rodent Proof*
- Repels rodents from pallet cover*
- Reduces rodent penetrations into palletized contents.*
- Reduces the amount of items being contaminated by rodents*
- Prevents rodents from eating through the pallet cover.*
- Will keep the pallet cover protected from rodents.*
- Will prevent rodents from eating into palletized cartons.*
- *effective against the Norway Rat
- Contains fresh mint scent
- Rat Repellent Pallet Cover
- Improved stability or products or packages
- Enhanced efficiency in the handling and storage of unit loads
- Cost effective way to keep loads intact and sanitary.