



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

July 2, 2001

MEMORANDUM:

Subject: Product Efficacy Review for EPA Reg. No.: 5813-58 / Spruce-Ups
DP Barcode: D273331
Case No: 061904

To: Velma Noble, PM 31 / *Zenobia Jones*
Regulatory Management Branch
Antimicrobials Division (7510C)

From: Ian Blackwell, Biologist
Efficacy Evaluation Team
Product Science Branch
Antimicrobials Division (7510C)

Through: Emily Mitchell, Team Leader
Efficacy Evaluation Team
Product Science Branch
Antimicrobials Division (7510C)

Applicant: The Clorox Company

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
N-Alkyl Dimethyl Benzyl Ammonium Chloride	0.145
N-Alkyl Dimethyl Ethylbenzyl Ammonium Chloride	0.145
<u>Other Ingredient(s):</u>	<u>99.710</u>
Total:	100.00%

BACKGROUND: The Clorox Company has submitted a product efficacy study in order to support the addition of non-food sanitization claims to the label of their product "Spruce-Ups". The study was conducted by The Clorox Technical Center. The MRID Number is 453383-01.

RECOMMENDATIONS: PSB findings are:

MRID Number 453383-01: "Clorox Formula F2001.0011- Non-Food Contact Sanitizer Test" by Denis Haire. Study Number ME-042. Study Completion Date 2/22/2001.

This study was conducted to determine the ability of "Clorox Spruce-Ups" to act as a non-food contact surface sanitizer. The study was conducted using one Spruce-Up wipe per contaminated ceramic or stainless steel carrier. The carriers were inoculated with *Klebsiella pneumoniae* (ATCC 4352) and *Staphylococcus aureus* (ATCC 6538), the standard bacteria for this assay. Each carrier was wiped back-and-forth with the product eight times. The exposure to the expressed test liquid (from the wiping) lasted for 30 seconds at room temperature. Under the conditions of this study, Spruce-Ups demonstrated a bacterial reduction greater than 99.9% of both species. Spruce-Ups were demonstrated to be effective non-food contact surface sanitizers on ceramic and stainless steel surfaces.

LABELING:

1. The registrant may add a statement to the label stating that this product is an effective sanitizer of ceramic and stainless steel surfaces.
2. Remove the statement "Can help reduce the risk of spreading and/or illness on hard non-porous surfaces."
3. All statements with can help reduce the risk of cross contamination on treated surfaces must delete endings such as "during flu season", "during travel", etc.
4. Delete can help stop the spread of the flu and/or common cold.
5. Clarify areas around the toilet that boys miss.
6. All disinfection claims must be four minutes, not four or five minutes.
7. The following statements must be removed from the product label:
 - "No wipe disinfect faster or in a shorter time."

- "Makes killing bacteria easy."
- "(Kills) Bacteria in the hot zones in the house."