

675-35

5/5/2003

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY - 5 2003

Mr. Bob MacDonald  
Agent for Reckitt Benckiser, Inc.  
Scientific & Regulatory Consultants, Inc.  
P.O. Box 1014  
Columbia City, IN 46725

Subject: Vani-Sol Bulk Disinfectant Washroom Cleaner  
EPA Registration No. 675-35  
Amendment Date: February 20, 2003  
EPA Receipt Date: February 21, 2003

Dear Mr. MacDonald,

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable with the conditions listed below:

- Update label and CSF

**Conditions**

Revise the label as follows:

1. Under "For All Washroom Surfaces," the surface, "tiles" and "woodwork," must be qualified as hard, nonporous by stating "*glazed tiles*" and "*finished woodwork*."
2. Under "For All Washroom Surfaces," revise the phrase, "toilet surfaces," to state "*exterior toilet surfaces*."
3. "Under "For All Washroom Surfaces," revise the phrase, "environmental surfaces," to state "*hard, nonporous environmental surfaces*."
4. Under "For Disinfecting," it is unclear as to the intent of the phrases, "fill trigger sprayer or pistol grip sprayer with this product undiluted." It would seem that this language is for "Refill" purposes and should be placed elsewhere on the label.

CONCURRENCES

SYMBOL								
BURNAME								
DATE								

The "Disinfecting" directions must state "Preclean surfaces prior to disinfection. Thoroughly wet surfaces using trigger sprayer or pistol grip sprayer. Allow contact time of 10 minutes. Wipe off with dry absorbent cloth or paper towel."

5. Since this product makes a deodorizing claim, the "For General Cleaning" heading must be revised to state "For General Cleaning and Deodorizing."
6. Since this product controls mold and mildew, specific instructions with a heading must appear on the label as follows:  
  
Mildewstat: To control mold and mildew on pre-cleaned, hard nonporous surfaces, thoroughly wet surfaces. Wipe off with dry absorbent cloth. Repeat application at weekly intervals or when mildew growth appears.
7. The claim, "cleans and shines surfaces outside the washroom," must be revised to state, "Cleans and shines plastic surfaced desks, typewriter keys, and all smudged and painted hard nonporous surfaces outside the washroom."
8. It is felt that the bottom of page 3 of the label is confusing because it is not clear as to what type of claim is being assigned to these surfaces. The bold statement states "cleans" yet the section combines language typically associated with disinfection directions for food contact surfaces (ie. rinse food contact surfaces with potable water). Therefore, you must delete the surfaces, candy/gum/drinking machines and water fountains." If you wish to support these surfaces, then specific disinfection directions as to where the product may be applied as well as use sites (where these surfaces may be found) must be added to the label.

Please Note: The surface, secretarial chairs, is considered a porous surface because most if not all secretarial chairs are covered with fabric. The efficacy data submitted to support this product does not support porous surfaces, so a disinfection claim for this surface is not acceptable.

### **General Comments**

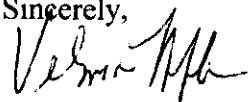
The Confidential Statement of Formula dated February 20, 2003 is acceptable. It is in compliance with PR Notice 91-2 and in agreement with the label.

A stamped copy of the labeling accepted with conditions is enclosed. Submit three (3) copies of your final printed label before distributing or selling the product bearing the revised labeling.

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If you have any questions regarding this letter, please contact Jacqueline McFarlane at (703) 308-6416.

Sincerely,



Velma Noble  
Product Manager (31)  
Regulatory Management Branch I  
Antimicrobials Division (7510C)

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**Vani-Sol**  
Bulk Disinfectant Washroom Cleaner

[Ready-to-Use]  
[Non-Abrasive]  
[Deodorizing]  
[[Cleans] [and] [Shines] [All Washroom Surfaces]]

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

MAY - 5 2003

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. **675-35**

**Active Ingredients:**

Alkyl (67% C <sub>12</sub> , 25% C <sub>14</sub> , 7% C <sub>16</sub> , 1% C <sub>8</sub> -C <sub>10</sub> -C <sub>18</sub> ) dimethyl benzyl ammonium chlorides .....	0.08%
Alkyl (50% C <sub>14</sub> , 40% C <sub>12</sub> , 10% C <sub>16</sub> ) dimethyl benzyl ammonium chloride .....	0.02%
<b>Other Ingredients:*</b> .....	<u>99.90%</u>
<b>Total</b> .....	100.00%

\*Includes detergents, other grease cutting agents, and contains no phosphates.

**KEEP OUT OF REACH OF CHILDREN**

**WARNING**

See Back (Side) Panel for Additional Precautionary Statements

Net Contents: [One Gallon (128 fl. oz.) 3.79 Liters]	{ for one gallon size }
[Five Gallons (640 fl. oz.) 18.93 Liters]	{ for five gallon size }
[55 Gallons (7,040 fl. oz) 208.20 Liters]	{ for 55 gallon size }

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{This list of organisms is for informational purposes. The organisms may or may not be listed on the final printed label and if listed may use a different format.}

[On hard non-porous inanimate environmental surfaces, this product kills the following bacteria, fungus and virus:]

**BACTERIA:**

Staphylococcus aureus  
Streptococcus pyogenes

**FUNGUS:**

Trichophyton mentagrophytes

**VIRUSES:**

Influenza A<sub>2</sub>

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{Labels with multiple uses must include the appropriate headings directly preceding the respective use directions. These headings are optional for labels with only one use pattern.}

### FOR ALL WASHROOM SURFACES

[· Washbowls] [· Bathtubs] [· Chrome Fixtures] [· Tiles] [· Shower Stalls] [· Toilet Surfaces]  
[· Walls] [· Floors] [· Woodwork] [· Mirrors]  
[· Cleans [quickly] [and] [easily] without EVER [scratching] [or] [dulling]  
[· Deodorizes-Freshens-No stale washroom odors]  
[[· Kills Influenza A<sub>2</sub>], [Staphylococcus aureus], [Streptococcus pyogenes] [and] [Trichopyton  
mentagrophytes] on environmental surfaces.]  
[[· Removes [mold] [and] [mildew] [and] [mildew stains] [and] [controls their growth on hard,  
nonporous surfaces.]]

### Directions for Use:

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

### For Disinfecting:

- Preclean surface prior to disinfection.
- [· Fill [trigger sprayer] [or] [pistol grip sprayer] with [this product] [Vani-Sol Bulk Disinfectant Washroom Cleaner] undiluted. [This product] [Vani-Sol Bulk Disinfectant Washroom Cleaner] is ready to use.]
- Then spray surface wet with [this product] [Vani-Sol Bulk Disinfectant Washroom Cleaner].
- Allow a contact time of 10 minutes.
- Wipe off with dry absorbent cloth or paper towel to both clean and polish.

### For General Cleaning:

- For stubborn soil or heavy build-up of soap scum on shower walls, apply [this product] [Vani-Sol Bulk Disinfectant Washroom Cleaner] and allow to remain wet for 15 to 20 seconds before wiping off.
- To control mold or mildew, repeat application as necessary.

### Cleans and shines many surfaces outside the washroom area

[· Candy], [Gum] [and] [Drink Machines]  
[· Water Fountains]  
[· Plastic Surfaced Desks]  
[· Typewriter Keys] [and] [Secretarial Chairs]  
[· All Smudged, Painted Surfaces (Rinse all food contact surfaces with potable water before use.)]

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### Precautionary Statements

Hazards to humans and domestic animals.

**WARNING:** Causes substantial but temporary eye injury. Harmful if absorbed through skin or if inhaled. Do not get in eyes, on skin or on clothing. Wear protective eyewear (safety glasses, goggles or faceshield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Avoid breathing spray mist.

{First Aid text may appear either in a boxed format or other highlighted formats on the final label in a manner to distinguish it from other label language. }

### 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 INHALED:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration. Preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

### CONTACT NUMBER

Questions? Comments or In case of an emergency call toll free (1-800-228-4722). Have the product container or label with you when calling a poison control center or doctor or going for treatment.

### STORAGE / DISPOSAL {For sizes 1 gallon or less. }

Store in an area inaccessible to small children. Rinse empty container thoroughly and discard.

### STORAGE AND DISPOSAL {For sizes over 1 gallon. }

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

### STORAGE

Store in original container in areas inaccessible to small children. Keep securely closed.

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

### CONTAINER DISPOSAL

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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**ENVIRONMENTAL HAZARDS** {For sizes 5 gallons or more}

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.

Please encourage your state and local authorities to establish a recycling program so that this [bottle] [container] can be recycled.

Questions? Comments? Call 1-800-228-4722.

Monday – {thru} Friday, 8:45 a.m. – {to} 4:30 p.m. [Eastern time].

[Visit us at [www.reckittprofessional.com](http://www.reckittprofessional.com)]

[Reckitt-Benckiser Inc. Professional (company logo)]

Reckitt Benckiser, Inc.  
1655 Valley Road  
Wayne, NJ 07474-0977

EPA Reg. No. 675-35

EPA Est. No. {Insert establishment number here}