

DEC 14 2005

Ms. Mary C. Pisculli
Regulatory & Registration Compliance Associate
Reckitt Benckiser Inc.
Morris Corporate Center IV
399 Interpace Parkway
Parsippany, NJ 07054-0225

Subject: Lysol Brand Fresh Scent Cling Thick Liquid Disinfectant
Toilet Bowl Cleaner
EPA Registration No. 777-70
Application Date: 7/27/05
Receipt Date: 7/29/05

Dear Ms. Pisculli:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable with comments:

- Update master label
- Revise formula with increased A.I. level & re-register as basic formula
- Revise the Directions for use contact time

ACUTE TOXICITY

1. The signal word is "**DANGER**", based upon the results of the primary eye irritation study.
2. Due to the results of the primary eye irritation study, this product qualifies as a Restricted-Use pesticide. This is according to the 40 CFR 152.70.
3. This product also satisfies the EPA requirements for Child-Resistant Packaging (CRP), according to the 40 CFR 157.22. The PM Team should decide if Child-Resistant Packaging is necessary or if alternative labeling will allay the requirement for restricted use classification. If this product is designated a Restricted-Use pesticide, CRP will not be required.
4. The Precautionary Statements should state:
"Corrosive. Causes irreversible eye damage. Harmful if absorbed through skin. Do not get in eyes, on skin or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with water after handling. Remove con-

SYMBOL	75100						
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DATE	12-14-05						

taminated clothing and wash clothing before reuse”.

5. The First Aid Statements should state:

IF IN EYES:

- . Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes.
- . Get medical attention.

IF ON SKIN:

- . Wash with plenty of soap and water
- . Get medical attention

EFFICACY

1. The proposed label claims that the product, Lysol Brand Fresh Scent Cling Thick Liquid Disinfectant Toilet Bowl Cleaner, is a disinfectant on hard non-porous surfaces against the following microorganisms for a contact time of 15 minutes:

- Staphylococcus aureus
- Salmonella choleraesius
- Rotavirus WA

Data provided by the applicant support these claims

2. The proposed label claims that the product Lysol Brand Fresh Cling Thick Liquid Disinfectant Toilet Bowl Cleaner, is a sanitizer on hard, non-porous, non-food contact surfaces against Enterobacter aerogenes and Staphylococcus aureus with a 30-second contact time. Data provided by the applicant support these claims. The applicant needs to revised the proposed label to include directions for using the product as a sanitizer.

3. The applicant may want to make the following changes to the proposed label, as appropriate.

On page 2, in the sentence beginning “*****Kills 99.9% of Enterbacter aerogenes”, delete “Rotavirus WA”.

On page 3, under instructions “To Clean and Disinfect”, change “sizes” to read “sides”.

See separate package for Chemistry Report

GENERAL COMMENTS

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

Should you have any questions or comments concerning this letter, please contact Zenobia Jones at (703) 308-6198.

Sincerely,



Velma Noble

Product Manager 31

Regulatory Management Branch 1

Antimicrobial Division (7510C)

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<< Front Panel >>

ACTIVE INGREDIENTS:

Alkyl (50% C ₁₄ , 40% C ₁₂ , 10% C ₁₆)	
dimethyl benzyl ammonium chloride	0.49%
Octyl decyl dimethyl ammonium chloride	0.37%
Didecyl dimethyl ammonium chloride	0.22%
Dioctyl dimethyl ammonium chloride	0.14%
OTHER INGREDIENTS:	<u>98.78%</u>
TOTAL:	100.00%

KEEP OUT OF REACH OF CHILDREN

DANGER: SEE BACK (SIDE) PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

NET CONTENTS:	22 FL. OZ. (1 PT. 6 FL. OZ.)	(650 mL)
	24 FL. OZ. (1 PT. 8 FL. OZ.)	(709 mL)
	32 FL. OZ. (1 QT.)	(946 mL)

(4) 32 FL. OZ. (1 QT.) 946 mL TOTAL: 1 gal. (4 qt.) 3.78 L

<< Front or Back Panel >>

EPA Reg. No.: 777-70
EPA Est. No.: 777-NJ-2
 777-OH-1
See bottom or side (for Lot/Date code)

<< Back Panel >>

Questions? Comments? Call: (1-800-228-4722) (1-800-677-9218)
(or) Visit us at (www.lysol.com) (www.reckittprofessional.com)
Made in U.S.A. © RBI (year)
Distributed by: Reckitt Benckiser Inc., Parsippany, NJ 07054(-xxxx)
Important facts about (this product):
Contains no phosphates
This (bottle) (container) is made of x% post-consumer recycled plastic.

<< Back Panel - Optional text >>

Company Logo (Reckitt Benckiser Professional)
Recycle Symbol

ACCEPTED
with COMMENTS
EPA Label Date
DEC 14 2005
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 777-70

NOTE: Bracketed information is denoted as: << directive >>, { insert as noted }, (optional text), [required qualifier].
The term "this product" used throughout this document may be replaced with the marketed product brand name.
To use the term "germ" the product must be efficacious against 2 of the 3 major classes of organisms.
The product label must identify the specific bacteria, virus, fungus & mold.

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<< Front or Back Panel - Marketing / Product Performance claims – use as bullet point or in paragraph format >>

(Citrus) (Country) (Fresh) (Garden) (Lavender) (Pacific Fresh) (Spring Waterfall) (Summer) (Summer Fresh)
(Clean) (Scent)

Angle neck bottle (For easy under-the-rim cleaning)
Bactericidal
Cleans & Deodorizes
Cleans, disinfects and deodorizes even under the rim.
Clings to the bowl to remove tough stains.
Disinfects
For use in homes
Kills 99.9% of germs in 30 seconds***
Kills germs**
Kills germs** while it cleans.
Kills Rotavirus WA in 30 seconds.
Kills some (household) germs**
Kills the following: {insert organisms}
Leaves a fresh clean scent.
Removes rust stains
Safe for white and colored bowls.
Thick formula
Thick liquid (disinfectant) (deodorizer)
Thick liquid formula sticks to the bowl for better cleaning.
Toilet Bowl Cleaner
Will not harm plumbing or septic tanks.

**Kills (household) germs: Staphylococcus aureus (Staph), Salmonella choleraesuis (Salmonella) and Rotavirus WA in (bathroom) toilet bowls.

***Kills 99.9% of Enterobacter aerogenes, Staphylococcus aureus (Staph) and Rotavirus WA on hard, non-porous surfaces in 30 seconds.

<< IMPORTANT: All organisms must be identified by genus & species.
Abbreviations may be included but must appear in (parens). >>

<< Hard non-porous surfaces >>

<< Disinfection against Bacteria >>	Salmonella choleraesuis (Salmonella) Staphylococcus aureus (Staph)
<< Disinfection against Virus >>	Rotavirus WA
<< *** Sanitization against Bacteria >>	Enterobacter aerogenes Staphylococcus aureus (Staph)

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<< Back Panel - Use directions – IMPORTANT: Advisory statements must be included were appropriate >>

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

Read the entire label before using this product.

To Open Child Resistant Cap: Hold bottle firmly with one hand on a flat surface. With other hand, squeeze sides of cap where indicated while turning counterclockwise. (Do not remove cap.) Avoid squeezing bottle when opening. To reseal, twist cap clockwise until tightly closed.

To Clean and Disinfect: Raise toilet seat. Flush bowl and remove heavy soil by scrubbing with a stiff brush prior to (application of) (using) this product. Point top of bottle down into bowl. Squeeze (gently, directly,) at least 4 oz. (squeeze approximately 15 seconds) of the thick formula under the rim and on the sides of the bowl, letting it run down into the water. Let stand for at least 15 minutes, then brush entire bowl even under the rim and flush. Rinse brush in fresh bowl water after each use.

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals
DANGER: Corrosive. Causes irreversible eye damage. Harmful if swallowed or absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin. Wear protective eyewear (safety glasses) and rubber gloves when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

FIRST AID	
If in eyes	<ul style="list-style-type: none">• 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	<ul style="list-style-type: none">• Take off 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	<ul style="list-style-type: none">• 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.
CONTACT NUMBER	
Questions? Comments or In case of an emergency, call toll free (1-800-228-4722) (1-800-677-9218). Have the product container or label with you when calling a Poison Control Center, or doctor, or going for treatment.	
NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate the use of gastric lavage.	

PHYSICAL AND CHEMICAL HAZARD: Never use with Chlorine Bleach or any other chemical product.

<< Storage and Disposal language – Household containers >>

STORAGE AND DISPOSAL: Store out of reach of children. Clean up spills right away. Do not reuse empty container. Wrap bottle and put in trash.

<< Storage and Disposal language – Professional containers 1 gallon or less >>

STORAGE AND DISPOSAL

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

STORAGE: Store out of reach of children. Clean up spills right away.

DISPOSAL: Do not reuse container. Wrap bottle and put in trash.

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