

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

October 21, 2011

Ms. Mary C. Pisculli
Regulatory & Registration Compliance Specialist
Reckitt Benckiser LLC
Morris Corporate Center IV
399 Interpace Parkway
Parsippany, NY 07054-0225

Subject:

Lysol Brand TBC with Bleach

EPA Registration Number: 777-102

Letter Date: October 18, 2011

EPA Receipt Date: October 19, 2011

Dear Ms. Pisculli:

The label amendment, submitted in connection with registration under section of the federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted.

Should you have any questions or comments concerning this letter, please contact Adam Heyward via email at heyward.adam@epa.gov or by telephone at (703) 347-0274 during the hours of 6:00 am to 2:30 pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

A stamped copy of the label is enclosed for your record.

March

Sincerely.

Monisha Harris

Product Manager (32)

Regulatory Management Branch II Antimicrobials Division (7510P)

Enclosure: Stamped Labeling

Lysol Brand <u>TBC</u> with Bleach EPA Reg. No.: 777-102

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<< FRONT PANEL >>

ACTIVE INGREDIENT:

 Sodium Hypochlorite
 2.0%

 OTHER INGREDIENTS:
 98.0%

 TOTAL:
 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING: Eye and skin irritant.

See (back) (side) panel for additional precautionary statements and first aid. Use only in well-ventilated areas.

NET CONTENTS:

16 FL. OZ. (1 PT.) 473 mL 24 FL. OZ. (1 PT. 8 FL. OZ.) 709 mL 32 FL. OZ. (1 QT.) 946 mL

(2) 24 FL. OZ. (1 PT. 8 FL. OZ.) (3) 24 FL. OZ. (1 PT. 8 FL. OZ.) 709 mL TOTAL: 48 FL. OZ. (1 QT. 1 PT.) 1.41 L 709 mL TOTAL: 72 FL. OZ. (2 QTS. 8 FL. OZ.) 2.12 L

(4) 32 FL. OZ. (1 QT.) (6) 32 FL. OZ. (1 QT.)

946 mL TOTAL: 946 mL TOTAL:

<u>128 FL. OZ.</u> (1 GAL.) 3.78 L 192 FL. OZ. (1.5 GAL.) 5.67 L

<< FRONT / BACK PANEL >>

EPA Reg. No.: EPA Est. No.: 777-102 777-NJ-2

8791-MO-1

(See bottom or side) (for Lot / Date code)

<< BACK PANEL >>

Questions? (Call:) (1-800-228-4722) (1-800-677-9218)
For ingredient (and other) information, (www.rbnainfo.com) (website)
Distributed by: Reckitt Benckiser, Parsippany, NJ 07054 (-xxxx)
Made in U.S.A. © (year) RB

Made in <u>U.S.A.</u> <u>© {year} RE</u> Contains no phosphates.

This (bottle) (container) is made of 25% post-consumer recycled plastic.

Reckitt Benckiser

Company graphic logo

<< FRONT / BACK PANEL - Option text >>

Limited Quantity Transportation Symbol
Important facts (about this product)

Encourage your state and local authorities to establish a program to recycle this (bottle) (container).

IMPORTANT: For directions for use and first aid instructions in Spanish, please call 1-877-843-3817.

<< Spanish Translation >>

IMPORTANTE: Para instrucciones de uso y primeros auxilios en español por favor llame al 1-877-843-3817.

Learn more about (the importance of good hygiene habits) (and the many ways that Lysol® is promoting good hygiene habits) (for your family and community), go to www.spreadinghealth.com.

ACCEPTED

OCT 2 1 2011

Under the Federal Insecticide, Fungicide, and Rodenticide, Act as amended, for the pesticide, registered under

pesticide, registered under PAReg. No. 777-102

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*.

The term (x) is a placeholder that represents a number between 1 and 99.

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<< NOTE: Any claim may appear on FRONT / BACK panel in bullet / paragraph format – Unless otherwise noted. >>

<< INTRODUCTORY 6-mos. CLAIMS – will only appear on graphic label for the first 6 months product is on shelf >>

(New) (Improved) (Formula) (<u>Angle</u> neck bottle) (Cap) (Fragrance) (Pack) (Package) (Scent) (Size) (Better) (Improved) (Bowl coverage than before)
Better reach under the rim
Better squirting than before
(Improved) (Better) (Bowl) (Coverage) than (Liquid Bleach) (APC) (other TBCs)

<< PACKAGING CLAIMS >>

(2 PACK) (3 PACK) (4 PACK) (6 PACK) (x PACK) (x Uses per pack) (x Uses per bottle) (Cleans x toilets) (x Uses) (Multi-Pack) (Multi-Toilet Pack) (Value Pack) (Limited Time Value Pack) (Limited Time Value) (One for each bathroom) (Place 1 in each bathroom) (Great) (Bonus) (Economy) (Value) (Trial) (Pack) (Size) (Mega Value Pack) (Mega Value Size) (Buy x get x free) (2 for 1 Pack) (2 in 1 Pack) (32 oz. for the price of 16 oz.) (x oz. at the price of x oz.) (2 x 24 FL. OZ.) (3 x 24 FL. OZ.) (4 x 32 FL. OZ.) (6 x 32 FL. OZ.) (More value for same price; now also removes allergens†† (Bonus 50%) (50% Free) (16 oz. for Free) (32 oz. for the price of 16 oz.) (Bonus 33%) (33% Free) (8 oz. for Free) (32 oz. for the price of 24 oz.) (24 oz. for the price of 16 oz.) (Money back guarantee) (Your # 1 choice) (Take the Lysol® Challenge) (Try it yourself) (or) (Get your money back)

Angle neck bottle (for easy under-the-rim cleaning) Best value bottle Buy me again Contains up to x uses Convenient cap Designed for (more) (better) dispensing Easy grip bottle Easy to close Easy to reach under the rim (Easy) (Easier) to (open) (squeeze) cap Easy to use (bottle) Helps reach under the rim Leak-proof cap Long (angle) neck bottle (reaches under the rim) Non-drip Non-removable cap Quick(er) to open Removable cap (Repurchase time) (Shopping time) (Time to replace) Specially designed angle neck - gets all the way up under the rim (Specially) designed (cap) for better (bowl) coverage (Unique) Angle neck bottle (for hard to reach areas) (reaches under the rim)

<< USAGE CLAIMS >>

Can be used in white and colored bowls
For better results use at least (once) (twice) a week
For use in (toilet bowls) (bidets) (and) (urinals)
(Intended) For use (only) in {insert use site from list on page 5}

Note:

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<< MARKETING CLAIMS >>

(Bactericidal) (Deodorizer) (Disinfectant) (Disinfects) (Sanitizer) (Sanitizes) (Virucidal†)

(Complete Clean) (Completely) (Easily) (Effective) (Effectively) (Quickly) (Thoroughly) (Cleans) (Shines) (Whitens) (Deodorizes) (Fast / Easy / Effective) (Toilet Bowl Cleaner) (With Bleach) (Toilet Odor Control) (Toilet Bowl Disinfectant)

(Easy to use) (Non-abrasive) (Thick Clinging) (Thick Formula) (Thick Gel) (Thick Liquid) (Formula)

(Maximum) (Max) (Improved) (Bowl) (Coverage) (Power) (Clean) (Cleaning action) (Cleaner) (Cleaning)

2-in-1 (Formula): (Cleans, Disinfects)

Triple Action (Formula): (Cleans, Disinfects, Deodorizes) (Cleans, Disinfects, Sanitizes)

3-in-1 (Formula): (Cleans, Disinfects, Deodorizes) (Cleans, Disinfects, Refreshens) (Cleans, Disinfects, Sanitizes)

4-in-1 (Formula): (Cleans, Deodorizes, Disinfects, Sanitizes)

X% More Cleaning Ingredients †††

X% More Product †††

X% More Size †††

X% More uses per bottle †††

Larger bottle per bathroom

More uses per bottle †††

[††† vs. (Lysol® Power Toilet Bowl Cleaner) (Lysol® Cling Toilet Bowl Cleaner) (Lysol® Lime & Rust Remover Toilet Bowl Cleaner) (x) (oz.)]

Clean Fresh Scent

Confidence of Lysol®

Contains a detergent cleaner plus chlorine bleach

Fresh Clean Scent

Great for everyday (cleaning) (deodorizing) (disinfecting) (and) (&) (sanitizing)

Meets AOAC Use-dilution Efficacy test standards for hospital disinfectant toilet bowl cleaners

This product contains no phosphates and is germicidal when used as directed for disinfecting.

<< PERFORMANCE CLAIMS >>

Brightens and whites

Brilliant white cleaning

Cleans & whitens

Disinfectant power of Lysol®

Fast acting whitening power

Great whitening power

Has a clean (fresh) (pleasant) scent

Leaves a fresh clean scent

Leaves bowl disinfected, clean and shiny

Leaves toilet bowl sparkling clean and disinfected

No hard scrubbing

Non-abrasive formula (won't scratch your bowl)

Power of bleach

Thick liquid coats the bowl for better cleaning

Thick liquid formula sticks to the bowl for better cleaning

Thick powerful formula

Whitens (and) brightens toilet bowl

Whiten & shines

Note:

Whitens and shines in seconds

Whitens and shines on contact

Whitens as it cleans

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<< NOTE: ALL SUPPORTING CLAIM QUALIFIERS - must appear before 'Directions For Use' on Back Panel label >>

<< CLEANING / DEODORIZING CLAIMS >>

3X Cleaning Power

3X (the) Cleaning Power on {insert soils from list on page 5}

(This product) has 3X Cleaning Power to remove {insert soils from list on page 5}

Brightens as it cleans

Cleans & Deodorizes

Cleans above and below the waterline

Cleans and disinfects above and below the waterline

Cleans as it disinfects

Cleans, disinfects and deodorizes even under the rim

Cleans, disinfects and sanitizes the bowl

Cleans everyday toilet bowl dirt and grime

Cleans with the power of bleach

Clings around the bowl

Controls toilet odors

Deep Down Clean

For a (bright) (shiny) (white) (clean) toilet bowl

(Helps) (Remove(s) Toilet Rings

Powerful cleaning (formula)

Removes tough stains

Use daily to help maintain a clean, fresh and shiny toilet bowl (even under the rim)

<< CLEANING CLAIMS - Non-Living Allergens†† >>

Controls (insert allergen soils from list on page 5)

Controls allergens††

Controls (the most common) (household) allergens†† (in your bowl)

Eliminates (insert allergen soils from list on page 5)

Eliminates allergens††

Eliminates (the most common) (household) allergens†† (in your bowl)

(Even) Removes allergens†† (hiding under the rim)

Neutralizes {insert allergen soils from list on page 5}

Neutralizes allergens††

Neutralizes (the most common) (household) allergens†† (in your bowl)

Reduces (insert allergen soils from list on page 5)

Reduces allergens††

Reduces (the most common) (household) allergens†† (in your bowl)

Removes {insert allergen soils from list on page 5}

Removes allergens††

Removes (the most common) (household) allergens†† (in your bowl)

<< SUPPORTING ALLERGEN REMOVAL CLAIM QUALIFIER >>

†† This product removes the following allergens: (cat dander) (cockroach debris) (cockroach matter) (cockroach particles) (dog dander) (dust mite debris) (dust mite matter) (dust mite particles) (pet dander) (pet hair allergens) (pollen particles).

Note:

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<< May be listed on product label in the singular / plural form >>

Use Sites:

Clinics

Hospitals Hotels / Motels

Nu Off

Nursing Homes Office Buildings Physician's Offices

Doctor Offices Health Care Facilities

Day Care Centers

Dental Offices

Infirmaries Institutions Laboratories

Restaurants Schools

Homes (Households)

Surfaces:

Bidets Toilets Urinals Porcelain Vitreous china

Soils:

Organic Soil

Lime scale

Rust Stains

Non-Living Allergen Soils††:

Cat dander Cockroach debris Cockroach matter

Cockroach particles

Dog dander
Dust mite debris
Dust mite matter
Dust mite particles

Pet dander Pet hair allergens Pollen particles

Note:

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<< SANITIZING CLAIMS - Hard, non-porous, non-food contact surface >>

Kills 99.9% of bacteria in seconds***

Kills in 30 seconds: {insert organisms <u>from list on page 7</u>} Sanitizes in 30 seconds: {insert organisms <u>from list on page 7</u>}

<< SUPPORTING SANITIZING CLAIM QUALIFIER >>

*** Kills 99.9% of (Campylobacter jejuni) (Enterobacter aerogenes) (Escherichia coli O157:H7) (Listeria monocytogenes) (Pseudomonas aeruginosa) (Salmonella enterica) (Staphylococcus aureus) (and) (Vibrio cholerae) (on hard, non-porous surfaces) (in 30 seconds.)

<< DISINFECTING CLAIMS - Hard, non-porous surface >>

Disinfects, deodorizes and kills odor-causing bacteria

Disinfects under the rim

Disinfects with bleach

Effective against: {insert organisms from list on page 7}

(Even) removes mold and mildew hiding under the rim

Gives you (full) (complete) (total) disinfection inside the toilet

Helps reduce germs by killing bacteria and viruses found in the toilet

Kills bacteria*

Kills (more than) (99.9% of) bacteria and (&) viruses**

Kills (more than) (99.9% of) viruses and (&) bacteria**

Kills (99.9% of) bacteria and (&) viruses above and below the waterline**

Kills (99.9% of) Germs**

Kills (99.9% of) germs above and below the waterline**

Kills (99.9% of) germs in hard to reach areas**

Kills (99.9% of) germs where you can't see**

Kills household Germs**

Kills in 5 minutes: {insert organisms from list on page 7}

Kills mold

Kills (the) most common germs**

Kills odor-causing bacteria

Kills the following (bacteria) (and) (viruses): {insert organisms from list on page 7}

Kills the following (germs): {insert organisms from list on page 7}

Kills viruses†

Proven to kill: {insert organisms from list on page 7}

Total disinfection for inside your toilet (above and below the waterline)

<< SUPPORTING DISINFECTING CLAIM QUALIFIERS >>

- * Kills (Campylobacter jejuni) (Enterococcus faecalis) (Pseudomonas aeruginosa) (Salmonella enterica) (and) (Staphylococcus aureus) (on hard, non-porous surfaces) (in 5 minutes)
- ** Kills (Campylobacter jejuni) (Enterococcus faecalis) (Pseudomonas aeruginosa) (Salmonella enterica) (Staphylococcus aureus) (Herpes Simplex Virus Type 1 & 2) (Human Immunodeficiency Virus Type 1 [AIDS Virus]) (Rhinovirus Type 39) (Rotavirus WA) (Aspergillus niger) (and) (Trichophyton mentagrophytes) (on hard, non-porous surfaces) (in 5 minutes).
- † Kills (Herpes Simplex Virus Type 1 & 2) (Human Immunodeficiency Virus Type 1 [AIDS Virus]) (Rhinovirus Type 39) (and) (Rotavirus WA) (on hard, non-porous surfaces) (in 5 minutes)

Note:

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This product has been test and found effective against the following micro-organisms:

Bacteria / Virus & Fungi

<< Disinfection - Hard, non-porous surfaces >>

Bacteria (5 minutes)

Campylobacter jejuni (29428)
Enterococcus faecalis (828)
Pseudomonas aeruginosa (15442)
Salmonella enterica (10708)
Staphylococcus aureus (6538)

Viruses (5 minutes)

Herpes Simplex Virus Type 1 (VR-733)
Herpes Simplex Virus Type 2 (VR-734)
Human Immunodeficiency Virus Type 1 n/a
Rhinovirus Type 39 (VR-340)
Rotavirus WA (VR-2018)

Fungi (5 minutes)

Aspergillus niger (ATCC No.)

(6275 & 16404) (mold & mildew)

Trichophyton mentagrophytes (9533) (Athlete's Foot Fungus)

Sanitization – Hard, non-porous, non-food contact surfaces >>

Bacteria (30-seconds)

(ATCC No.) Campylobacter jejuni (29428)Enterobacter aerogenes (13048)Escherichia coli O157:H7 (43888)Listeria monocytogenes (19111)Pseudomonas aeruginosa (15442)(10708)Salmonella enterica Staphylococcus aureus (6538)Vibrio cholerae (11623)

Symbol Designation - used on product labels

Single asterisk (*)
Dagger (†)
Viruses †
Used for identifying disinfection against specific bacteria
Used for identifying disinfection against specific viruses
Used for identifying disinfection against specific bacteria & viruses / fungi
Triple asterisk (***)
Sanitizes ***
Used for identifying disinfection against specific bacteria & viruses / fungi
Used for identifying sanitization against specific bacteria
Used for identifying the removal of specific non-living elegens

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<< USE DIRECTIONS >>

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 product.

Apply Carefully - Contains Bleach

[(This product)] should not be used or placed on toilet bowl lids, vanities, sinks, bathtubs, cabinets, countertops, rugs, etc. Clean up spills and drips immediately. Will not harm plumbing or septic systems.

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.

<< Optional Side panel pictogram - can only be used in conjunction with required back panel instructions >>

<< Non-removable Pictogram text >>

To Open Child Resistant Cap:

- 1. Place fingers on marked cap ridges.
- 2. Squeeze cap firmly and turn counterclockwise until it stops. Do not remove cap.
- To reseal, squeeze cap again and turn clockwise. DO NOT squeeze bottle when opening.



- Place fingers on marked cap ridges.
- Squeeze cap firmly and turn counterclockwise until it stops. Do not remove cap.
- 3. To reseal, squeeze cap again and turn clockwise.

DO NOT squeeze bottle when opening.

To Clean / Disinfect (/ Sanitize) (and Remove Allergens††):

- 1. Flush toilet before cleaning.
- 2. Apply 6 oz. to coat the bowl including under the rim. Do not close lid.
- To Clean: Scrub entire bowl and under rim thoroughly.
 Disinfect: Let sit for 5 minutes. (Sanitize: Let sit for 30 seconds.)
 Then flush.
- (4. Rinse brush in fresh water after use.) (Repeat if needed.)

<< For 32 oz bottle: >>:

To Clean / Disinfect (/ Sanitize) (and Remove Allergens††):

- Flush toilet before cleaning.
- 2. Apply 6.4 oz. [squeeze bottle about 16 seconds] to coat the bowl including under the rim.
- Do not close lid.
- 3. To Clean: Scrub entire bowl and under rim thoroughly.
 - Disinfect: Let sit for 5 minutes. (Sanitize: Let sit for 30 seconds.)
 - Then flush.
- (4. Rinse brush in fresh water after use.)

(Repeat if needed.)

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<< Additional USE DIRECTIONS (claim specific) - Specific to Professional Branded products Only >>

KILLS HUMAN IMMUNODEFICIENCY VIRUS TYPE 1 [HIV-1 AIDS Virus] ON PRE-CLEANED ENVIRONMENTAL SURFACES / OBJECTS PREVIOUSLY SOILED WITH BLOOD / BODY FLUIDS, in health care settings or other settings in which there is an expected likelihood of soiling of inanimate surfaces / objects with blood or body fluids; and in which the surfaces / objects likely to be soiled with blood or body fluids can be associated with the potential for transmission of Human Immunodeficiency Virus Type 1 [HIV-1] [associated with AIDS].

SPECIAL INSTRUCTIONS FOR CLEANING AND DECONTAMINATION AGAINST HIV-1 OF SURFACES / OBJECTS SOILED WITH BLOOD / BODY FLUIDS:

PERSONAL PROTECTION: When handling items soiled with blood or body fluids, use disposable latex gloves, gowns, masks and eye coverings.

CLEANING PROCEDURES: Blood and other body fluids must be thoroughly cleaned from surfaces and objects before application of this product.

CONTACT TIME: Allow surface / object to remain wet for 30 seconds.

DISPOSAL OF INFECTIOUS MATERIALS: Blood and other body fluids must be autoclaved and disposed of according to local regulations for infectious waste disposal.

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<< PRECAUTIONARY / FIRST AID / CHEMICAL HAZARD / STORAGE & DISPOSAL INSTRUCTIONS >>

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

WARNING: Causes eye and skin irritation. Do not get in eyes, on skin or on clothing. Vapors may irritate. Use only in well-ventilated areas. Avoid prolonged breathing of vapors. Not recommended for use by persons with heart conditions or chronic respiratory problems such as asthma, emphysema or obstructive lung disease. Harmful if swallowed. For sensitive skin or prolonged use, wear rubber gloves.

<< NOTE: First Aid statement may not appear in "box" format for 16 & 24 oz. individual containers due to label constraint >>

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	 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	 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 the 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 further treatment advice.
	CONTACT NUMBER
	Comments or In case of an emergency call toll free (1-800-228-4722) (1-800-677-9218). Have ontainer or label with you when calling a Poison Control Center or doctor or going for treatment.

PHYSICAL AND CHEMICAL HAZARDS: This product contains bleach. Do not mix with other (household) chemicals such as products containing ammonia, toilet bowl cleaners or acid cleaners as hazardous gases may be released.

<< STORAGE & DISPOSAL - Residential containers >>

STORAGE AND DISPOSAL:

STORAGE: Store in original container, in a cool, well-ventilated area, inaccessible to small children. Keep securely closed. **PESTICIDE DISPOSAL**: To avoid waste, use all material in this container according to label directions. **CONTAINER DISPOSAL**: Non-refillable container. Do not reuse or refill this container. If empty: Place in trash or offer for recycling, if available. If partly filled: Call your local solid waste agency for disposal instructions.

<< STORAGE & DISPOSAL - Commercial / Institutional / Industrial containers >>

(NOTE: Residue removal statement is not applicable for this container because it has a CRC plug making it inherently non-refillable.)

STORAGE AND DISPOSAL:

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

STORAGE: Store in original container in a cool, well-ventilated area, inaccessible to children. Keep securely closed.

PESTICIDE DISPOSAL: Pesticide wastes may be 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 the label directions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. (To avoid waste, use all material in this container according to label directions.) If empty: Place in trash or offer for recycling, it available. If partly filled: Call your local solid waste agency for disposal instructions.

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