

777-107

3/8/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 8, 2012

Mary C. Pisculli
Reckitt Benckiser
Morris Corporate Center IV
399 Interpace Parkway
Parsippany, NJ 07054

Subject: Dynamite 35
EPA Registration Number: 777-107
Letter Date: December 9, 2011
EPA Receipt Date: December 12, 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 acceptable with conditions listed below.

Proposed label amendment:

- Add/revise section headers
- Incorporate all previous Agency comments on master label dated July 21, 2008
- Incorporate all Agency-approved notifications/non-notifications

Conditions:

- Add the name of the product – “Dynamite 35” – to the “front panel” section at the top of page 1.
- Remove the word “Recommended” from the phrase “Recommended for frequently flushed toilets” in the marketing/cleaning & deodorizing claims section on page 3.
- Remove the words “safe” and “tank safe” in the same section. Rephrase to read “Does not stain white or colored toilet bowls” and “Does not damage tank.”
- Remove the word “safe” from “Safe to use with other (toilet bowl) (trigger) cleaners” on page 5. Rephrase to read “Does not interact with other (toilet bowl) (trigger) cleaners.”

General Comments:

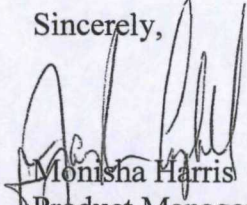
A stamped accepted copy of the label with conditions is enclosed for your record. Submit one copy of your final printed labeling before distributing or selling this product bearing the

SYMBOL								
SURNAME								
DATE								

revised labeling. This amendment and a copy of this letter have been placed in this product's file for future reference.

Should you have any questions or comments concerning this letter, please contact Eliza Blair via email at blair.eliza@epa.gov or by telephone at (703) 308-7279.

Sincerely,



Monisha Harris
Product Manager (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

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<< FRONT PANEL >>

ACTIVE INGREDIENTS:

1-bromo-3-chloro-5,5-dimethylhydantoin	60.0%
1,3-dichloro-5,5-dimethylhydantoin	27.4%
1,3-dichloro-5-ethyl-5-methylhydantoin	10.6%

OTHER INGREDIENTS:	2.0%
TOTAL:	100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER: See (back) (side) panel for additional precautionary statements and first aid.

(NET CONTENTS:)	(1) (Tablet)	1.2 OZ.	(35 g)
	(2) (Tablets)	2.4 OZ.	(70 g)
	(4) (Tablets)	4.8 OZ.	(140 g)

<< Net contents statement for tablets in the Lysol® unit >>

CONTAINS: (x) Unit(s) 1.2 OZ. (35 g) (tablet) (each) (unit)

<< FRONT (BACK) PANEL >>

EPA Reg. No.: 777-107
 EPA Est. No.: 74010-NJ-001
 84472-CHN-1
 (See bottom or side) (for Lot / Date code)

ACCEPTED
 with COMMENTS
 EPA Letter Dated:

MAR - 8 2012

<< BACK PANEL >>

Questions? (C) (Call:) (1-800-228-4722) (1-800-677-9218)
 For ingredient (and other) information, (www.rbnainfo.com) (website)
 (Made in U.S.A.) (Made in China) © (year) RB
 Distributed by: Reckitt Benckiser, Parsippany, NJ 07054 (-xxxx)
 Contains no (phosphates) (ammonia) (silicones)

Under the Federal Insecticide, Fungicide, and Herbicide Act (FIFRA), this product is amended for the use of () registered under EPA Reg. No.

777-107

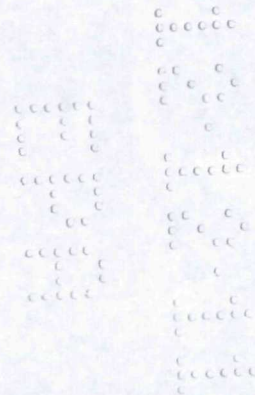
Company graphic logo



<< BACK PANEL – optional text >>

Important facts (about this product)
 This container is made of x% post-consumer recycled plastic.
 Recycle symbol

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 .



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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) (Pack) (Package) (Size)

<< PACKAGING CLAIMS >>

(x Pack) (2 Pack) (Limited Time Value Pack) (Buy me again) (Savings) (Save) (\$ x) (off) (on) (any) (one)
(Great) (Bonus) (Economy) (Value) (Trial) (Pack) (Size)

Easy to use
Good for (x) flushes
Last for (x) flushes
One for each bathroom
Place 1 in each bathroom

<< MARKETING / CLEANING & DEODORIZING CLAIMS >>

(Antibacterial) (Bactericidal) (Cleans) (Deodorizer) (Deodorizes) (Easily) (Easy) (Easy to use) (Effective) (Effectively) (Fast)
(Formula) (Freshens) (Quickly) (Sanitizes) (Sanitizing) (Toilet Bowl Cleaner) (Toilet Bowl Sanitizer)

3 in 1 (tablet): (Cleans, Sanitizes, Deodorizes) (in) the toilet bowl water
(Cleans, Sanitizes, Freshens)
(Cleans, Sanitizes, Removes Stains)
(Deodorizes, Freshens, Removes Stains)
(Sanitizes, Deodorizes, Freshens)
(Sanitizes, Deodorizes, Removes Stains)
(Sanitizes, Freshens, Removes Stains)

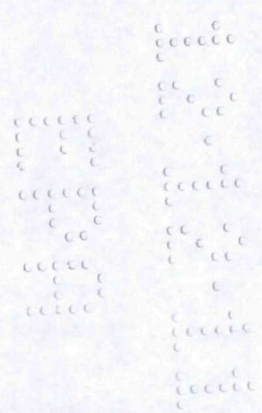
All in (one) (1) complete
(A little bit of) bleach(s) (with every) (after each) flush
Bleach cleaning
Bleaches
Bleaching (Action) (Power)
Cleans and freshens (with every flush)
Cleans and Sanitizes the toilet bowl water
Cleans (and) (sanitizes the toilet bowl water) (and) (deodorizes) (and) (freshens) (and) (removes stains)
Cleans & deodorizes (with bleach) (with every flush)
Cleans bowl (continuously) (automatically)
Cleans, deodorizes and sanitizes the bowl water
Cleans, Sanitizes Deodorizes the toilet bowl water
Concentrated (bleach) (formula)
Confidence of Lysol®
Continuous (automatic) (cleaning)
Continuous bleach cleaning and deodorizing
Continuous (power) (action) toilet bowl cleaner
Continuous power (cleaner) (cleaning)
Continuous toilet cleaning (system) (unit) (gadget) (mechanism)
(Continuously) (and) (Automatically) (cleans) (and) (freshens) for up to 3 months (*) (and sanitizes the toilet bowl water for 2 months)
(Continuously) (Automatically) bleaches away stains
(Continuously) (Automatically) (Helps) prevent(s) the build-up of stains
(Continuously) (Automatically) (Helps) prevent (water) (toilet) ring
Controls odors (at their source)
Controls odor(s) (caused) (by) bacteria
Controls toilet odors
Daily toilet cleaning and maintenance
Deodorizes with a fresh (clean) scent

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<< **MARKETING | CLEANING & DEODORIZING CLAIMS – continued** >>

Does not (clog) (or) (interfere) (with) (flapper) (the) (functioning of the toilet)
(Does not harm) (Not harmful to) plumbing (or septic tanks) (systems)
Does the cleaning for you
(Drop) (Insert) in the tank and walk away
Dye free
Easy to use – Just drop in tank
(Easy) (Simple) to (install) (use)
(Easy) (Simple) installation
Fights (tough) stains (while it sanitizes)
For a bright (white) (clean) toilet bowl
For colored toilets
Freshens
(Helps) deodorize(s) your toilet bowl
(Helps) freshen(s) the toilet bowl (continuously)
Helps keep your toilet bowl fresh (and clean)
(Helps) keep(s) your toilet bowl (fresh) (clean)
(Helps) your toilet bowl smelling clean
(Helps) prevent stain build-up
(Helps) (Prevents) (Toilet) (water) ring
(Installs) (Attaches) in (seconds) (moments)
(Installs) (Attaches) (quickly) (and / or) (easily)
In-tank sanitizer (for homes) (schools) (hospitals)
In-tank automatic toilet bowl cleaner
Keeps water clear
(Keeps) (working) (and) (lasts) (cleans) for up to 3 months
(Lasts) (cleans) up to (3 months(*)) (12 weeks(*)) (and sanitizes the toilet bowl water for 2 months)
Leaves a fresh, clean scent
Leaves bowl (sanitary) (fresh) (clean)
(Makes) (simplifies) (weekly) cleaning (easy) (easier)
Makes (regular) (weekly) (manual) cleaning easier
No mess (in tank)
No (hard) scrubbing
Odor control
Power of (Lysol® plus bleach) (bleach)
Prevents stains
(Quick) (and/or) (easy) to install
Recommended for frequently flushed toilets
Safe for white and colored toilet bowls
Simple (x) step process
Tank safe (guarantee)
This product contains no phosphates or phosphorous compounds
Toilet odor control
Triple Action (table): (Cleans, Sanitizes, Deodorizes the toilet bowl water)
(Use) (clean) (for) (up to) 3 month(*) (and sanitizes the toilet bowl water for 2 months)
Whitening and brightening action
Will not (clog) (or) (damage) tank (parts)
Will not harm plumbing or septic systems
(with) (Contains) (clear) (colorless) (bleach)
You'll be surprised how easy (it is to install)



<< **SUPPORTING CLAIM QUALIFIER** >>

* Sanitizes for 2 months

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<< **SANITIZING CLAIMS** >>

Antibacterial

- Continuous** (antibacterial) action
- Continuous** (Automatic**) antibacterial action
- Continuous** (Automatic**) sanitization
- Continuous** (Automatically**) kills (99.9% of) bacteria*** (in the bowl's water) (with every) (after each) (flush) (for up to 2 months) (for up to 8 weeks)
- Each tablet sanitizes for (8 weeks) (for 2 months)
- (Each tablet) (continuously**) (automatically**) kills 99.9% of {insert micro-organism – See table below}
- Eliminates 99.9% of bacteria (in 1 minute) (after each flush)
- Kills odor-causing bacteria*** (in the bowl water)
- Kills bacteria*** that cause odors (at the source)
- Kills 99.9% of bacteria*** (in the toilet bowl water) (after each) (with every) (flush)
- Kills 99.9% of bacteria*** (after each) (with every) (flush) (in the bowl's water)
- Kills 99.9% of bacteria*** for (8 weeks) (2 months)
- Kills (99.9% of) odor-causing bacteria*** (in the bowl's water) (with every flush)
- Kills Enterococcus faecalis (Strep)
- Kills Escherichia coli (E. coli)
- Kills Salmonella enterica (Salmonella)
- Kills Staphylococcus aureus (Staph)
- Kills bacteria*** for (8 weeks) (2 months) (in the toilet bowl water after each flush)
- (Kills) (Fights) (many) odor-causing bacteria*** (in the bowl's water) (Continuously**) (Automatically**)
- Lasts for (2 months) (8 weeks)
- Leaves bowl 99.9% bacteria free
- Leaves bowl's water (sanitary) (and) (or) (fresh) (and) (or) (clean) for 2 months
- Proven to kill {insert micro-organism – See table below}
- Sanitizes (and) (or) Cleans (and) (or) Deodorizes the toilet bowl water
- Sanitizes and cleans the toilet bowl water (automatically**) (for 8 weeks) (for 2 months)
- Sanitizing formula cleans & deodorizes the toilet bowl water
- Sanities toilet bowl water (after each flush) (with every flush) (automatically**) (continuously**)
- When used as directed, this product will sanitize toilet bowl water, keeping it clean, clear and free of odor

<< **SUPPORTING CLAIM QUALIFIERS** >>

- ** (for) (up to) 2 months
- *** Kills 99.9% of (Enterococcus faecalis) (Escherichia coli) (Salmonella enterica) (and) (Staphylococcus aureus)

<< Sanitization – <u>Hard, non-porous, non-food contact surfaces</u> >>	
Bacteria:	(ATCC No.)
Enterococcus faecalis	(11700)
Escherichia coli	(11229)
Salmonella enterica	(10708)
Staphylococcus aureus	(6538)

<< **Use Sites:** >>

- | | | | |
|------------------------|--------------------|---------------------------|-------------------|
| Clinics | Homes (households) | Laboratories | Physicians Office |
| Day Care Center | Hospital | Long Term Care Facilities | (Public) Restroom |
| Dental Office | Hotel / Motel | Nursing Home | Restaurant |
| Doctors Office | Infirmaries | Office Building | School (College) |
| Health Care Facilities | Institutions | | |

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<< Additional CLAIMS – Specific for the Tablet in the Lysol® Unit Only >>

(Attaches) (places) (hangs) (sits) (fits) easily (inside tank) (in) (just) (a few) seconds
Attaches to tank in seconds! (You'll be surprised how easy!)

Consistently (and) (automatically) (releases) (delivers) (just) the right amount of (powerful) (cleaners) (bleach) (ingredients) (actives)
Delivers (just) the right amount of bleach (active) (to the bowl) (with every flush)

Direct delivery mechanism forces water through the (unit) (consistently) (automatically)

Does not wastefully dissolve (in) (the) (tank)

Each (Lysol®) (gadget) (unit) (continuously**) (automatically**) sanitizes for (8 weeks) (2 months)

For best results, use together (in combination) (in addition to) (with) {insert brand name of toilet bowl cleaner product}

Leaves no chemical deposits (on the tank base)

No mess (in the tank)

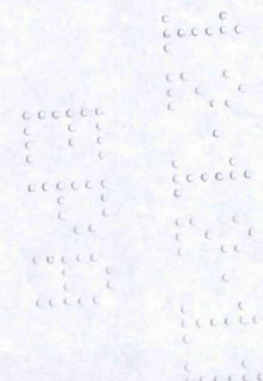
(Revolutionary) (innovative) (Product) (Cleaning) (delivery) (system) (mechanism)

Safe to use with other (toilet bowl) (trigger) cleaners

Won't harm tank parts (Tank safe)

<< SUPPORTING CLAIM QUALIFIER >>

** (for) (up to) 2 months



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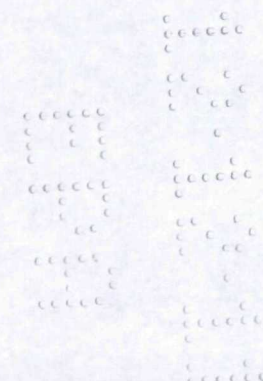
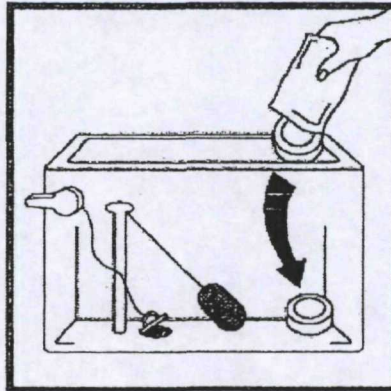
<< USE DIRECTIONS – Specific to the tablet >>

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

Product must be used in a toilet that is flushed regularly.

To Clean / Deodorize & Sanitize:

1. Clean toilet bowl thoroughly (including under the rim).
2. Remove toilet tank top. Cut pouch open with scissors on dotted lines. **Do not touch tablet.**
3. Flush toilet. Before tank refills, drop tablet into (tank near sidewall closest to the float and away from the water valve opening) (right rear corner of the tank) (See graphic). Wash hands thoroughly.
4. When tablet has dissolved, replace with a new tablet. Each tablet sanitizes for 8 weeks.



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<< **USE DIRECTIONS – Specific to the outer packaging for the Tablet in the Lysol® Unit Only** >>

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

Product must be used in a toilet that is flushed regularly.

Clean toilet bowl thoroughly (including under the rim). Remove lid from toilet tank carefully.

- (To Open:) Cut (pouch) (bag) open with scissors (on dotted lines).
- (To Open:) Tear (pouch) (bag) (at) (notch) (on) (dotted lines).
- (To Open:) Peel backing from package (as indicated). (Peel here.)
- (To Open:) Cut (package) (backing) (on dotted lines) (where indicated).
- (To Open:) (Remove pouch from carton) (and) (cut) (tear) (pouch) (open) (with scissors) (on dotted lines) (at notch).

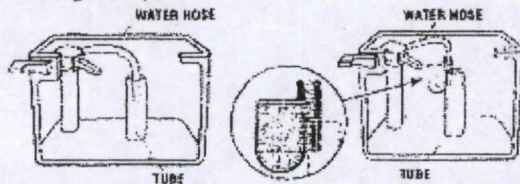
(Follow these) (3) (easy steps)

To Sanitize (and) Clean (and Deodorize): (As shown in the picture simply:)

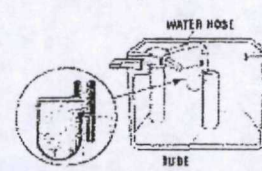
1. Remove water hose from the tube (at the center of tank).
2. Hang the Lysol® Unit onto the (overflow) tube (at the center of tank) (as shown).
3. Attach water hose into the top of the Lysol® Unit. (Replace lid) (and) (wash hands thoroughly).
(You'll be surprised how easy) (it is to install) (!)

<< **Optional pictograms – 1 of the below pictogram options will be used to illustrate the installation directions** >>

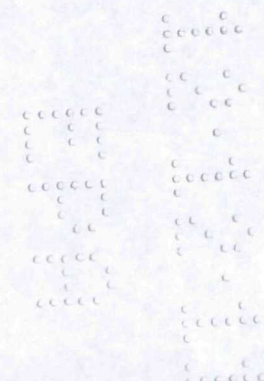
<< Pictogram Option 1 >>



<< Pictogram Option 2 >>



When tablet has dissolved, remove the Lysol® Unit from the toilet and discard in trash. Wash hands thoroughly.



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<< **USE DIRECTIONS – Specific to the installation for the Tablet in the Lysol® Unit Only** >>
(will be located in a leaflet)

<< **Side 1** >> Easy (3-step) instructions (on other side).
See outer packaging for Precautionary Statements and First Aid.
Questions, please call: 1-800-xxx-xxxx

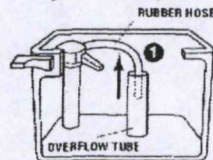
<< **Optional Demonstration Language** >>

To watch a simple demonstration about (attaching) (installing) (using) this product go to: [\[insert website\]](#)

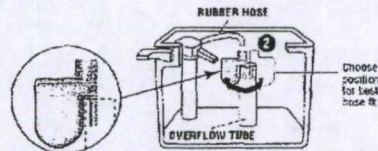
<< **Side 2** >> Installation Instructions

Follow these 3 easy steps:

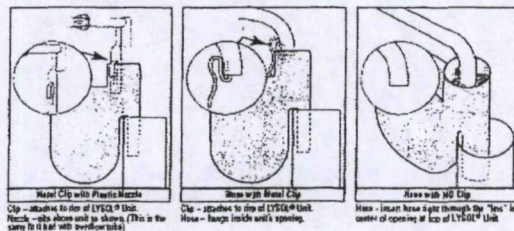
1. Lift the rubber hose (including the clip, if present) from the overflow tube.
(You may need to pull hard.)



2. Hang the Lysol® Unit onto the overflow tube as shown.



3. Attach your hose connection to the Lysol® Unit and wash hands thoroughly.
Which hose connection do you have?



<< **Pictogram text** >>

Metal Clip with Plastic Nozzle

Clip – attaches to rim of Lysol® Unit.
Nozzle – sits above unit as shown. (This is the same fit it had with overflow tube.)

Hose with Metal Clip

Clip – attaches to rim of Lysol® Unit.
Hose – hangs inside unit's opening.

Hose with NO Clip

Hose – insert hose right through the 'fins' in center of opening at top of Lysol® Unit.

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

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

KEEP OUT OF REACH OF CHILDREN

DANGER: Highly corrosive. Causes irreversible eye damage and skin burns. May be fatal if swallowed. DO NOT TAKE INTERNALLY. Irritating to nose and throat. Avoid breathing dust. Use with adequate ventilation. Do not get into eyes, on skin or clothing. Wear protective clothing, chemical resistant gloves and protective eyewear [goggles, face shield or safety glasses]. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

NOTE: First Aid statement may not appear in 'box' format due to label constraints.

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 or Clothing	<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 the Poison Control Center or doctor. • Do not give anything by mouth to an unconscious person.
If Inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably <u>by</u> 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) (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.	

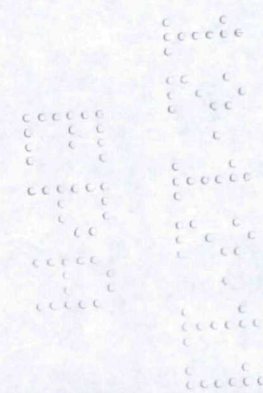
PHYSICAL AND CHEMICAL HAZARDS:

CHEMICAL HAZARD: STRONG OXIDIZING AGENT. Keep away from heat or flame. Mix only with water.

STORAGE AND DISPOSAL:

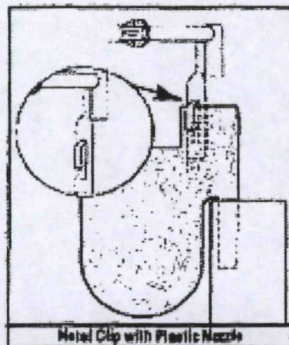
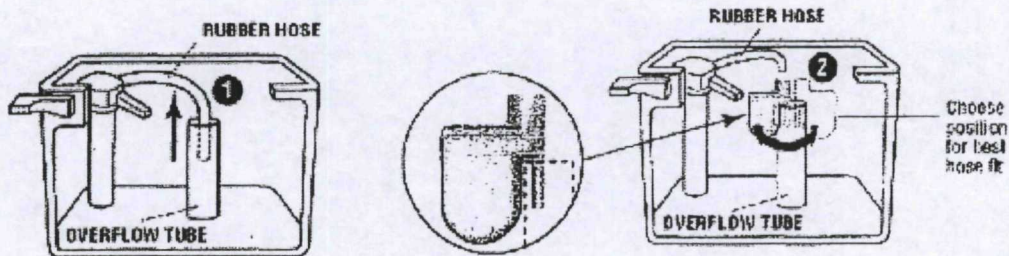
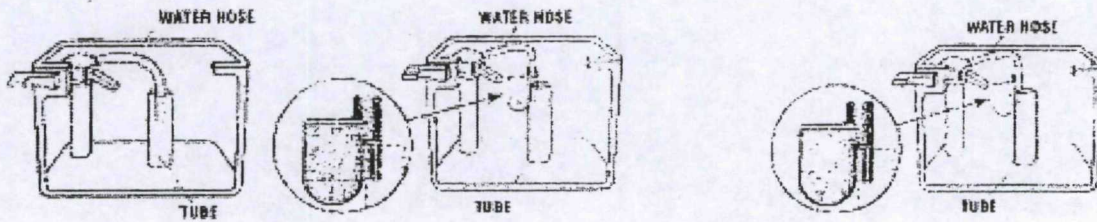
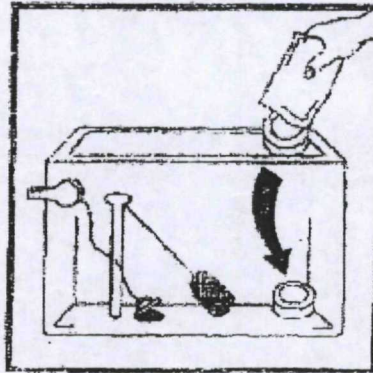
STORAGE: Store in original container, in areas inaccessible to children, in a cool, dry, well-ventilated area. Do not store at elevated temperatures.

DISPOSAL: Non-refillable container. Do not reuse or refill this container. Discard empty container in trash or offer for recycling if available.

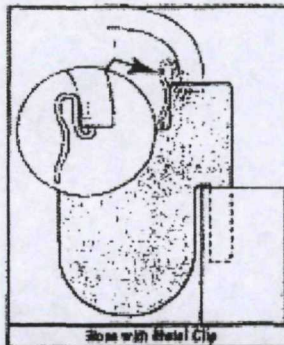


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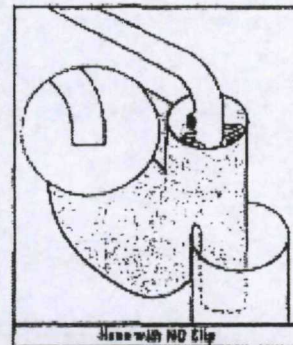
<< Enlarged Graphics >>



Metal Clip with Plastic Nozzle
 Clip - attaches to rim of LYSOL® Unit.
 Nozzle - sits above unit as shown. (This is the same fit it had with overflow tube)



Hose with Metal Clip
 Clip - attaches to rim of LYSOL® Unit.
 Hose - hangs inside unit's opening.



Hose with NO Clip
 Hose - insert hose right through the "flap" in center of opening at top of LYSOL® Unit.

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