OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

APR 2 5 2011



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

Mr. Thomas A. Lennan McLaughlin Gormley King Company 8810 Tenth Avenue North Minneapolis, MN 55427-4372

Dear Mr. Lennan:

Subject: Amendment- add two different fragrances (MRID 483480701

and 48348702) MGK[®] 29461

EPA Registration Number 1021-2559

Your submission dated January 7, 2011

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following comments:

- 1. The label claims that the product MGK 29461 (fresh pine and spring fresh fragrance), is an effective sanitizer against Staphylococcus aureus and Klebsiella pneumonia on pre-cleaned, hard non-porous, non-food contact surfaces for a 2-minute contact time. This claim is not supported and must be removed. Data provided for the two fragrance formulations demonstrated efficacy for a 5-minute contact time. The contact time on the label must be revised to read "5 minutes".
- 2. The claim "germs" must be qualified. In order to make an unqualified "germ" claim on the label, a product must have public health data developed using current EPA guidelines for all three of the major classes of organisms (i.e. bacteria, viruses, and fungi).
- 3. Remove the claim "Germ-Ender" and "Power[ed]" from the proposed label, as these imply higher level of efficacy.
- 4. Identify the surfaces or objects on which the product is recommended for use (e.g., bathroom fixtures, floors, walls).
- 5. Identify the types of surfaces on which the product may be used (e.g. chrome, glass, stainless steel, vinyl).

- 6. Remove claims that the product disinfects. The product has been demonstrated to effectively sanitize, which is a different level of treatment than disinfection.
- 7. Remove "[in one easy step]" as the claim suggests effectiveness in the presence of light/moderate organic loads.
- 8. Under the "Ingredients Statement" on the product label, the total amount of ingredients is not equal to 100.000%.
- 9. Remove the claim "Kills by contact" as this conflicts with the contact time required to demonstrate efficacy against Staphylococcus aureus and Klebsiella pneumonia.
- 10. Under the "Storage and Disposal" section on the proposed label, add the following statement after "Call your local solid waste agency for disposal instructions.". "Never place unused product down any indoor or outdoor drain.".

A copy of the efficacy review is enclosed for your records.

A stamped label is enclosed for your records.

If you have any questions you may contact Linda A. DeLuise at 703.305.5428.

Sincerely yours,

Leli A D Lum

Richard Gebken

Product Manager (13) Insecticide Branch

Registration Division (7505P)

Enclosure

Kills by contact!



8810 Tenth Avenue N. / Minneapolis, Minnesota 55427-4319 U.S.A. - Telephone (763) 544-0341

[New] Dual Action [New] 2 [jobs] in 1 [Application] [Spray]

Loaded with [Enhanced with] GermEnder™
Powered by GermEnder™
GermEnder™ Power
[GermEnder™] Kills and Disinfects [Sanitizes][in one application] [at once] [at the same time] [in one easy step] [in one shot]
Help[s] protect your family from the spread of germs bugs [insects] [household insects] [roaches] may leave behind Water based
For indoor household use only [Fragrance Free]
Fresh Pine [Fragrance]
Spring Fresh [Fragrance]
No lingering chemical odor

Kills Ants [Kills Fire Ants (including Red Imported Fire Ants, Southern Fire Ants, California Fire Ants, Tropical Fire Ants), Carpenter Ants, Argentine Ants, Pavement Ants, Larger Yellow Ants, Little Black Ants, Cornfield Ants, Odorous House Ants, Crazy Ants, Ghost Ants, White Footed Ants, Acrobat Ants, Field Ants, Velvety Tree Ants, Pharaoh Ants, Red Harvester Ants], Cockroaches [Roaches] (German Cockroaches), Palmetto Bugs, Spiders (including Black Widow Spiders, Daddy-Long-Legs Spiders, Marbled Cellar

Spiders, Giant Wolf Spiders, Burrowing Wolf Spiders, Banded Garden Spiders, Catface Spiders, Cupboard Spiders, Cobweb Weaver Spiders, Bud Spiders, European House Spiders, Common House Spiders, Southern House Spiders, Yellow Sac Spiders, Funnel Web Spiders, Grass Spiders, Ground Spiders, Parson Spiders, Bold Jumping Spiders, Woodlouse Spiders), Asian Lady Bird Beetles, Brown Dog Ticks, Carpet Beetles, Crickets, Fleas, Scorpions, Silverfish, Sowbugs (Pillbugs), and Waterbugs.

Keeps killing German roaches for up to 40 weeks [10 months] on non-porous surfaces
Kills 19 Home Invading Ant Species [and] [20 Home Invading Spider Species]

[New] formula!

Guaranteed to work [or your money back]

Won't stain or discolor

Reduces [Kills] [Disinfects] [Sanitizes] [Eliminates] 99.9% of household germs* that [roaches] [household insects] [bugs] [insects] may leave behind

Kills listed bugs and 99.9% of germs* they may leave behind.

America's 1st name in pest control [since 1833] [Optional Marketing Graphics] – Place intended graphics here – (Pine sprig, Flowers)

ACTIVE INGREDIENTS:		6 6 (666 6 6
Cypermethrin	¢.63¢%	c
Pyrethrins	ଡି.01 ใ%	c
ETOC (Prallethrin)	0.011%	C C C C E
Alkyl dimethyl benzyl ammonium chloride(C ₁₂₋₁₆)	0.008%	CCCECE
Octyl decyl dimethyl ammonium chloride	୦.୦୦ଙ୍	cccc
Dioctyl dimethyl ammonium chloride	0:003%	, cece
. Didecyl dimethyl ammonium chloride	0.003%	p
OTHER INGREDIENTS	97.928%	6 (
	100.00%	250055
MGK® - Registered trademarks of McLaughlin Gormley King Company		
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KEEP OUT OF REACH OF CHILDREN CAUTION

See side [back] panel for additional Precautionary Statements and First Aid.

	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 eyes. Call a poison control center or doctor for treatment advice.
Have the produc	t container or label with you when calling a poison control center or doctor or going for
treatment. For it	nformation regarding medical emergencies or pesticide incidents, call 1-888-740-8712.

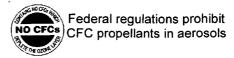
Net Weight _____ Manufactured by:

McLAUGHLIN GORMLEY KING COMPANY 8810 Tenth Avenue North Minneapolis, MN 55427

EPA Reg. No. 1021-2559

EPA Est. No. 1021-MN-2

Contains no CFCs or other ozone depleting substances



PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes moderate eye irritation. Avoid contact with, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco or using the toilet

ENVIRONMENTAL HAZARDS

Do not apply directly to water.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame, Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

MGK® 29461[Product Name][with] GermEnder™kills insects by contact, keeps killing roaches for ພ້າວ to 5 ດ 10 months, and reduces [kills] 99.9% of the household germs* that [roaches] [household insects] may leave behind. (No residual sanitizer action. Not for primary use as a sanitizer).

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

[STOP!]READ ENTIRE LABEL BEFORE EACH USE

SHAKE WELL BEFORE USE

For Indoor [Household] use:

Kill Ants (Fire Ants (including Red Imported Fire Ants, Southern Fire Ants, California Fire Ants, Tropical Fire Ants), Carpenter Ants, Argentine Ants, Pavement Ants, Larger Yellow Ants, Little Black Ants, Cornfield Ants, Odorous House Ants, Crazy Ants, Ghost Ants, White Footed Ants, Acrobat Ants, Field Ants, Velvety Tree Ants, Pharaoh Ants, Red Harvester Ants), Cockroaches[Roaches] (German Cockroaches), Palmetto Bugs, Spiders (including Black Widow Spiders, Daddy-Long-Legs Spiders, Marbled Cellar Spiders, Giant Wolf Spiders, Burrowing Wolf Spiders, Banded Garden Spiders, Catface Spiders, Cupboard Spiders, Cobweb Weaver Spiders, Bud Spiders, European House Spiders, Common House Spiders, Southern House Spiders, Yellow Sac Spiders, Funnel Web Spiders, Grass Spiders, Ground Spiders, Parson Spiders, Bold Jumping Spiders, Woodlouse Spiders), Asian Lady Bird Beetles, Brown Dog Ticks, Carpet Beetles, Crickets, Fleas, Scorpions, Silverfish, Sowbugs (Pillbugs), and Waterbugs.

For best effect, spray directly on insect.

For residual control of German cockroaches spray non-porous surfaces along baseboards, under sinks, refrigerator, stove, dishwasher, or other places where cockroaches may hide.

For Sanitizing: To sanitize pre-cleaned non-food surfaces, hold spray a maximum of 12" from surface being sprayed. Spray surface until thoroughly wet. Let stand for 2 minutes and allow to dry.

Do not use as a space spray. Do not apply this product in a way that will contact adults, children or pets, either directly or through drift.

Remove pets, birds, and cover fish aquariums before spraying. Remove and cover exposed food and drinking water before application. Remove or cover dishes, utensils, food processing equipment and food preparation surfaces or wash them before use. Do not enter treated areas or allow others, including children and pets to enter until sprays have dried.

STORAGE AND DISPOSAL Do not contaminate water, food, or feed by storage and disposal. Pesticide Storage Store in a cool, dry area. Always store pesticides in the original container. Store away fform food and pet food. Pesticide Disposal and Container Handling Do Not Puncture or Incinerate! Nonrefillable 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.