

1475-158

6/10/2008

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs  
Antimicrobials Division (7510C)  
1200 Pennsylvania Avenue NW  
Washington, D.C. 20460

EPA Reg. Number: 1475-158  
Date of Issuance: 06/10/2008

Term of Issuance: Conditional

Name of Pesticide Product: Willert Toilet Tablets

NOTICE OF PESTICIDE:  
 Registration  
 Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Willert Home Products  
4044 Park Avenue  
St. Louis, MO 63110

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to, and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product (OPP Decision No. 390451) is conditionally registered in accordance with FIFRA sec 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for re-registration of your product under FIFRA section 4.
2. Make the labeling changes listed below before you release the product for shipment:
  - a. Revise the "EPA Registration Number to read, "EPA Reg. No. 1475-158".

Signature of Approving Official:

Date:

Product Manager Team-  
Regulatory Management Branch  
Antimicrobials Division (7510P)

EPA Form 8570-6

CONCURRENCES

SYMBOL							
URNAM							
DATE							

3. Make the following changes to the Inner Pouch Label:

a. You must remove the claims "Lower Price!" and "Better Value!". These are comparative claims and are not acceptable as permanent marketing language.

b. You must remove all references to the killing of germs from the product label. In order to make a qualified "germ" claim on a product label, a product must be registered as a general purpose/broad spectrum disinfectant product with additional label claims against one of the two classes of organisms listed below:

- Fungi - One pathogenic fungi (usually Trichophyton mentagrophytes) that is representative of the use sites listed for the product.
- Viruses - One enveloped and/or non-enveloped virus that is representative of the use sites listed for the product.
- All studies to support disinfectant, fungicidal, and virucidal claims must be conducted according to EPA guidelines.
- The front panel of the label for a qualified public health "germ" claim must contain a designator that refers the user to the qualified statements. A qualified statement is one that clearly describes the type of "germ" the product is efficacious against. When the word "germ" is used on the front panel of a label, an asterisk is required to indicate that there is clarifying language elsewhere on the label.

Examples: Front panel - Kills germs\*

Back panel - Kills Salmonella choleraesuis and Staphylococcus aureus  
and (list virus or fungi)

In order to make an unqualified "germ" claim on a label, a product must have public health data developed using current EPA guidelines for all three of the major classes of organisms:

- Bacteria - meet the general purpose/broad spectrum disinfectant performance standard per EPA guidelines.
- Fungi - One pathogenic fungi (usually Trichophyton mentagrophytes) that is representative of the use sites listed for the product. Studies to be conducted according to EPA guidelines.
- Viruses - One enveloped and non-enveloped virus that is representative of the use sites for the product. Studies to be conducted according to EPA guidelines.
- The claim "germs" can be used without descriptors of the type of organism. No asterisk is required. The claim can appear on the front or back/side panel of a label. However, specific organisms must still be listed on the label.

Examples: Kills Germs

Kills germs in the bathroom and/or kitchen

- Qualified statements are optional and can be added to the product label, if desired.

Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

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

Sincerely,

Emily H. Mitchell  
Product Manager (32)  
Regulatory Management Branch  
Antimicrobials Division (7510P)

Enclosure: (Stamped Label)

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Front Panel – Outer Carton

# Willert Toilet Tablets

[Consolidated list of optional marketing claims in Appendix 1]

Active Ingredient:

Trichloro-s-triazinetrione.....75.0%

Other Ingredients:.....25.0%

[Total: .....100.0%]

[Available Chlorine 68%]

**ACCEPTED**  
with **COMMENTS**  
EPA Letter Dated:

JUN 10 2008

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. **1475-158**

KEEP OUT OF REACH OF CHILDREN

**DANGER:**

See back panel for additional Precautionary Statements and Directions for Use.

Net Weight: 3.5 oz. (170 g)

Back Panel – Outer Carton

**Directions for Use:**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. *For household use only.*

When used as directed, this product will sanitize toilet bowl water, keeping it clean, clear and free of odor. Sanitizing formula kills 99% of [household] germs in toilet bowl water after each flush. [Cleans and deodorizes.]

**To Sanitize, Clean and Deodorize:** For best results, clean toilet bowl thoroughly, including under the rim. Cut open pouch. Do not touch tablet directly. Flush toilet. When water level in tank is low, drop tablet into right rear corner of the tank. When tablet has dissolved, replace with a new tablet. Each tablet sanitizes for [3 months][up to 14 weeks].[This product contains no phosphates or phosphorus compounds.][Does not harm plumbing or septic tanks.]

## STORAGE AND DISPOSAL

**Storage:** Store in original container in a cool dry place inaccessible to children and pets.

**Disposal:** Non-refillable container. Do not reuse or refill this container. Place in trash or offer for recycling if available.

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**DANGER. CORROSIVE.** Causes irreversible eye damage and skin burns. May be fatal if swallowed. Harmful if absorbed through skin or inhaled. Do not get in eyes, on skin, or on clothing. Protect eyes and skin when handling. 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.

<b>FIRST AID</b>	
<b>If in eyes</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If inhaled</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>HOT LINE NUMBER</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticides Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.	
<b>NOTE TO PHYSICIAN</b>	
Probable mucosal damage may contraindicate the use of gastric lavage.	

#### PHYSICAL OR CHEMICAL HAZARDS

**STRONG OXIDIZING AGENT.** **Do not** mix with any other chemicals except water. Only add to water in toilet tank. Do not use with other cleaning or household chemicals.

Made [in the USA] for  
WILLERT HOME PRODUCTS  
4044 Park Avenue  
St. Louis, MO 63110

EPA Reg. No. 1475-  
EPA Est. No. [58401-IL-001][Pesticide Producing Establishment No.]

02-27-08

[Bracketed text] = optional language

### Inner Pouch Label

## Willert Toilet Tablets

**Active Ingredient:**

Trichloro-s-triazinetrione.....75.0%

Other Ingredients:.....25.0%

[Total: .....100.0%]

[Available Chlorine 68%]

KEEP OUT OF REACH OF CHILDREN

**DANGER:**

See outer carton for additional Precautionary Statements and Directions for Use.

Net Weight: 3.5 oz. (170 g)

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

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**FIRST AID**

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**PHYSICAL OR CHEMICAL HAZARDS**

**STRONG OXIDIZING AGENT.** Do not mix with any other chemicals except water. Only add to water in toilet tank. Do not use with other cleaning or household chemicals.

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## Appendix 1

### Optional Marketing Claims for Front or Back Panel of Outer Carton

Automatic Toilet Bowl Tablets

Automatic Toilet Bowl Cleaner

In-tank automatic toilet bowl cleaner

Each tablet sanitizes for [3 months] [up to 14 weeks]

Lasts up to 3 months

Cleans for up to 3 months

Sanitizes toilet bowl water after each flush

· Kills 99.9% of germs

· Kills 99.9% of household germs in [the] toilet [bowl water] [after each flush]

· Kills 99.9% of bathroom germs in [the] toilet [bowl water] [after each flush]

· Kills 99.9% of many odor-causing germs in [the] toilet [bowl water] [after each flush]

Keeps water clear

Not harmful to plumbing or septic systems

Won't harm [plumbing][pipes] [and] [or] [septic systems]

Bleaching action with every flush

Sanitizes toilet water with every flush

Cleans with bleach

Cleans · Deodorizes · Sanitizes

Cleans and deodorizes [with every flush]

Cleans and freshens [with every flush]

Cleans & Deodorizes

Deodorizes

Brightens & Deodorizes as it Cleans!

Cleans and deodorizes with the power of chlorine

Keeps bowl fresh and clean

Keeps your toilet bowl stain-free

Leaves bowl sanitary

Leaves bowl water crystal clear

For colored toilets

Won't harm colored toilets

Fights tough stains

Repels tough hard water, mineral and limescale stains

Repels stains [with every flush]

Prevents stain build-up

Prevents mineral and hard water stains

Child resistant packaging

Phosphate free

Contains no dyes

Controls odor produced by odor-causing bacteria

Controls the growth of bacteria that cause odors

Controls odors caused by odor-causing germs

Lower price!

Better value!

Do not use with ammonia as hazardous gases may be released.