

3573-54

11/6/2009

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

NOV 6 2009

Mary Joy Stuart
Regulatory Manager
The Procter & Gamble Company
5299 Spring Grove Ave
Cincinnati, OH 45217-1025

FILE COPY

Subject: Notification Application per PR Notice 95-2
Comet Disinfecting Bathroom Cleaner
EPA Registration Number: 3573-54
Application Date: October 23, 2009
Receipt Date: October 27, 2009

Dear Ms. Stuart:

This will acknowledge receipt of your notification, submitted under the provisions of PR Notice 95-2.

Proposed Notification:

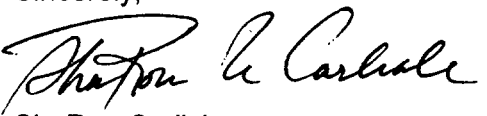
Addition of Influenza A virus (H1N1) Master Label claims.

General Comment:

Based on a review of the material submitted, the following comment applies:

The notification application is acceptable.

Should you have any questions concerning this letter, please contact Heather Garvie at (703) 308-0034 or by email address at garvie.heather@epa.gov.

Sincerely,

ShaRon Carlisle
(Acting) Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510P)



United States
Environmental Protection Agency
 Washington, DC 20460

registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 3573	2. EPA Product Manager ShaRon Carlisle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Comet Disinfecting Bathroom Cleaner 3573-54	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) Mary Joy Stuart The Procter & Gamble Company 5299 Spring Grove Ave., Cincinnati, OH 45217 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of additional Influenza A virus Master Label claims per PR Notice 95-2 and the EPA Guidance for Testing and Labeling Claims against Pandemic 2009 H1N1. This notification is consistent with the provisions of PR Notice 95-2 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt No. per container	<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 6, 17, 32, 64 fl oz., 1 gallon		5. Location of Label Directions <input checked="" type="checkbox"/> On Label	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input checked="" type="checkbox"/> Other in-mold labeling	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Mary Joy Stuart	Title Regulatory Manager	Telephone No. (Include Area Code) 513-627-6537
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature <i>Mary Joy Stuart / kuc</i>	3. Title Regulatory Manager	
4. Typed Name Mary Joy Stuart	5. Date Oct. 24, 2009	



The Procter & Gamble Company
 Fabric & Home Care - PS&RA
 Fabric & Home Care Innovation Center
 5299 Spring Grove Ave
 Cincinnati, OH 45217-1025
 www.pg.com

October 23, 2009

Office of Pesticide Programs
 Potomac Yard South building
 2777 South Crystal Drive
 Arlington, VA 22202
 Attn: Ms. ShaRon Carlisle (PM# 34)

**Subject: Comet Disinfecting Bathroom Cleaner (EPA Reg. No. 3573-54)
 Notification of Additional Influenza A virus Master Label Claims per PR Notice 95-2
 and the EPA Guidance for Testing and Labeling Claims against Pandemic 2009 H1N1**

Dear Ms. Carlisle:

Comet Disinfecting Bathroom Cleaner (EPA Reg. No. 3573-54) is currently registered as a hospital use disinfectant with claims against the Avian Influenza A virus. The Procter & Gamble Company has submitted and received approval of the efficacy data to support this label claim. Per the direction of the Agency's Guidance for Testing and Labeling Claims against Pandemic 2009 H1N1, The Procter & Gamble Company is submitting the following Notification for the addition of Influenza A virus Master Label claims identical to that contained in the EPA guidance. The proposed changes to the Master Label do not impact the product chemistry.

The proposed changes are as follows:

Location	Current Master Label	Proposed Oct. 23, 2009 Update
Page 5	<i>(not currently made)</i>	<ul style="list-style-type: none"> <li data-bbox="695 1381 1412 1669">• Respiratory illnesses attributable to Pandemic 2009 H1N1 are caused by influenza A virus. This product (Product Name) is a broad-spectrum hard surface disinfectant that has been shown to be effective against (influenza A virus tested and listed on the label) and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 (formerly called swine flu). <li data-bbox="695 1705 1412 1843">• This product has demonstrated effectiveness against influenza A virus and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 influenza A virus.

		<ul style="list-style-type: none"> • This product has demonstrated effectiveness against (influenza A virus tested and listed on the label) and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 (formerly called swine flu). • Kills Pandemic 2009 H1N1 influenza A virus (formerly called swine flu). • Kills Pandemic 2009 H1N1 influenza A virus.
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ENCLOSURES

In support of this request, the following materials are enclosed:

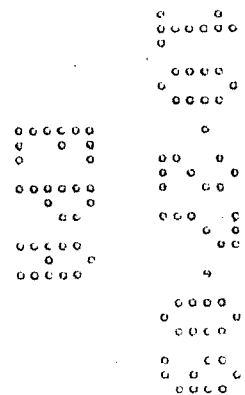
1. Application for Pesticide Registration (EPA Form 8570-1) for Comet Disinfecting Bathroom Cleaner (EPA Reg. No. 3573-54)
2. One (1) copy of the revised Comet Disinfecting Bathroom Cleaner Master Label (EPA Reg. No. 3573-54), dated Oct. 23, 2009, with updates shown in red
3. One (1) copy of the revised Comet Disinfecting Bathroom Cleaner Master Label (EPA Reg. No. 3573-54), dated Oct. 23, 2009 with changes incorporated

Thank you for your assistance in the processing of this Notification. It is the request of The Procter & Gamble Company that the Agency provide its decision electronically to stuart.m@pg.com. If you have any questions concerning the enclosed materials, please contact me at (513) 627-6537 or stuart.m@pg.com.

Sincerely,

Mary Joy Stuart /bcc

Mary Joy Stuart
Regulatory Manager
enclosures



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FRONT LABEL

COMET DISINFECTING BATHROOM CLEANER \ alternate brand name \ product name

ACTIVE INGREDIENTS: Citric acid.....6.0%

INERT INGREDIENTS:.....*94.0%

TOTAL.....100.0%

*Cleaning Agents, Quality Control Agents, Perfume and Water.

KEEP OUT OF REACH OF CHILDREN

CAUTION: MAY BE HARMFUL IF SWALLOWED. See back \ side panel for other precautions.

Net Weight Statement

[Optional]:

For containers that display disinfecting usage instructions or claims:

Ready-to-Use

Refill

Disinfectant

Hospital Use \ Hospital Grade \ Hospital Level \ Medical Environment Disinfectant

For containers intended for dilution (no disinfecting instructions):

For Automatic Dilution

Concentrate

5X Concentrate

41 (P&G identification number)

For any container:

Bactericide\Bactericidal

Virucide\Virucidal

Sanitizer

Institutional

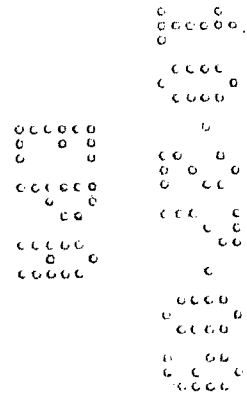
Commercial

P&G ProLine \ Procter & Gamble Professional [or logo]

For Institutional Use \ For Industrial and Institutional Use

NOT FOR RETAIL SALE

NOTIFICATION
Date Reviewed: 1/26-09
Reviewed By: H. J. [Signature]



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BACKSIDE LABEL

COMET DISINFECTING BATHROOM CLEANER \ alternate brand name \ product name

Note to reviewer: The Directions for Use on the final product label will display one of the two sets of general cleaning directions listed below. The Direction for Use with either display the bullet points of general cleaning directions (up to and including the "For best results \ On tougher soils..." paragraph) OR the alternate general cleaning directions beginning with the "GENERAL CLEANING [DIRECTIONS]...." paragraph up to and including the "Rinse all [kitchen] surfaces...." paragraph. The final product label will then display the "TO [CLEAN AND] DISINFECT (hard, non-porous surfaces)..." directions on the ready-to-use containers, or the "TO [CLEAN AND] SANITIZE (hard, non-porous surfaces)..." directions on any container to complete the Directions for Use.

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

- Lift flap and lock into arrow on top of sprayer. Picture of sprayer top. [*or for gallon size refill container only:* Refill [into] properly labeled spray bottle[s]. \ Refill [only] [properly labeled] [product name] spray bottle[s]. Picture of refill process.]
- Spray soiled surface until thoroughly covered [Picture of spraying action]
- Wipe with a damp cloth [or sponge]... for a shiny clean surface [*or* Spray soiled surfaces until thoroughly covered and wipe with a damp cloth [or sponge] [Picture of wiping action on bathroom surface]

For best results \ On tougher soils, allow product to remain on surface longer [*or* allow to soak]. [For daily cleaning, dilute 1 part product to [plus] 3 \ 4 parts water [(1) 8 oz [cup] per 32 oz spray bottle \ 6.4 oz per 32 oz spray bottle)]. Spray and wipe. On tougher soils, use product full strength.]

OR, in place of the above usage instructions, use the following general cleaning directions up to and including the "Rinse all [kitchen]..." paragraph:

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

GENERAL CLEANING [DIRECTIONS]: Apply to hard, non-porous surfaces. Spray \ Pour directly onto surface [*or* damp sponge] [*or* cloth] [*or* paper towel] [*or* towel]. Rinse or wipe clean. For [On] tough stains [or soil], let soak \ stand. \ For tougher soils, allow to soak. [(For non-disinfecting light \ daily [duty] [soil] cleaning, dilute up to 1 part concentrate \ product to 9 \ 19 parts water).]

Rinse all [kitchen] surfaces that come in contact with food [such as countertops] with potable water before reuse. [Do not use on utensils, glasses or dishes.]

For ready-to-use containers only:

TO [CLEAN AND] DISINFECT (hard, non-porous surfaces): Clean surfaces prior to disinfecting heavily soiled areas. \ For highly \ heavily soiled areas, clean before disinfecting \ following disinfecting directions. Thoroughly wet hard, non-porous surfaces [with [disinfecting] solution] for 10 minutes, then rinse or wipe clean. \ Spray product on surface and let stand for 10 minutes [before wiping]. [**TOILET BOWLS [AND URINALS]:** Empty water from the toilet bowl [or urinal]. [Hold 6-8" from surface.] Spray [covering] exposed surfaces. Brush thoroughly [over surfaces including the rim to completely wet surfaces], let stand for 10 minutes, then flush.]

For any container:

TO [CLEAN AND] SANITIZE (hard, non-porous surfaces): Clean surfaces prior to sanitizing heavily soiled areas. \ For heavily soiled areas, clean before sanitizing \ following sanitizing directions. Thoroughly wet hard, non-porous surfaces [with [sanitizing] solution] for 5 minutes, then rinse or wipe clean. \ Spray product on surface and let stand 5 minutes [before wiping]. [**TOILET BOWLS [AND URINALS]:** Empty water from the toilet bowl [or urinal]. [Hold 6-8" from surface.] Spray [covering] exposed surfaces. Brush thoroughly [over surfaces including the rim to completely wet surfaces], let stand for 5 minutes, then flush.] [For light \ daily [duty] [soil] cleaning & sanitizing, dilute \ mix 1 part concentrate \ product to \ with 4 parts water.]

Note to Reviewer: Bold, italicized text is for reader clarity only. Bracketed [] text denotes optional text. Backslash \ denotes alternate text.

Additional Directions for Use for closed chemical containers:

CONCENTRATED PRODUCT – DILUTE BEFORE USING [(1 gallon makes 5 gallons of diluted \ sanitizing product)]
ATTACHING THIS PRODUCT TO THE [P&G] [AUTOMATIC] DILUTION CENTER: Remove the [white] shipping cap. [Picture of automatic dilution center process]
DO NOT REMOVE [LIGHT] [GREEN] PLUG FROM BOTTLE THROAT! Screw on [light] [green] dispensing cap from dilution center [product tube]. Push down while twisting.
[PREPARING [SANITIZING] SOLUTION: Dilute \ Mix 1 part [of this] product \ concentrate with [4 parts] water using the [P&G] [AUTOMATIC] dilution center.]

Note to Reviewer: The order of the Directions for Use might differ on the product label from what is listed above, but the content of the information will be the same.

Note to Reviewer: The first aid information provided below is compliant with PR 2001-1 and was submitted to the Agency for review on June 25, 2003.

PRECAUTIONARY STATEMENT: HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes eye irritation. Avoid contact with eyes. May be harmful if swallowed. Do not mix with bleach or mildew stain removers as irritating fumes may result.

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 SWALLOWED, drink 1-2 glasses of water and call a doctor or poison control center (product contains an alcohol ethoxylate). Do not induce vomiting unless told to do so by a poison control center or doctor.

Have the product container or label with you when calling or going for treatment.

Note to Reviewer: The boxed format as listed above will be used if label space permits; otherwise, an alternative format will be used to emphasize the text, such as bullet points, increased white space, increased font size or different colors..

STORAGE/DISPOSAL: Store in a cool place.

(READY-TO-USE APPLICATION:)

Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. \ (or)

(Nonrefillable container.) Do not reuse or refill this container (except as described in the directions for use). Wrap [container] and put in trash or offer for recycling if available. \ (or)

(Nonrefillable container.) Do not reuse or refill this container (except as described in the directions for use). Wrap [container] and put in trash or offer for reconditioning if appropriate. \ (or)

Always refill/reuse this container as described in the directions for use. Otherwise, wrap [container] and put in trash or offer for recycling if available. \ (or)

Only refill/reuse this container as described in the directions for use. Otherwise, wrap [container] and put in trash or offer for recycling if available. \ (or)

Refill/reuse this container only as described in directions for use. Otherwise, wrap [container] and put in trash or offer for recycling if available.

(DILUTABLE APPLICATION – FIVE GALLONS OR LESS:)

Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. \ (or)

(Nonrefillable container.) Do not reuse or refill this container (except as described in the directions for use). Wrap [container] and put in trash or offer for recycling if available. \ (or)

(Nonrefillable container.) Do not reuse or refill this container (except as described in the directions for use). Wrap [container] and put in trash or offer for reconditioning if appropriate. \ (or)

Always refill/reuse this container as described in the directions for use. Otherwise, wrap [container] and put in trash or offer for recycling if available. \ (or)

Note to Reviewer: Bold, italicized text is for reader clarity only. Bracketed [] text denotes optional text. Backslash \ denotes alternate text.

Only refill/reuse this container as described in the directions for use. Otherwise, wrap [container] and put in trash or offer for recycling if available. \ (or)

Refill/reuse this container only as described in directions for use. Otherwise, wrap [container] and put in trash or offer for recycling if available.

Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

[Refill:

- Refill [32 oz] sprayer size from [this convenient] container.
- Use only in [product name] spray bottle.
- Only refill [convenient] sprayer with [product name] [this product].
- [Only] refill sprayer with [x oz.][only].
- Do not dilute].

Recycling logo Bottle made from 35% post-consumer recycled plastic.

[Contains] biodegradable cleaning agents.

[Contains] no phosphorus \ phosphate.

Will not harm septic tanks.

UPC code

Kosher Symbol

TM

®

©

Phone symbol Questions? [Comments?] [MSDS?] [A Material Safety Data Sheet (MSDS) is available upon request from your supplier.]

[Call Toll-Free] X-XXX-XXX-XXXX

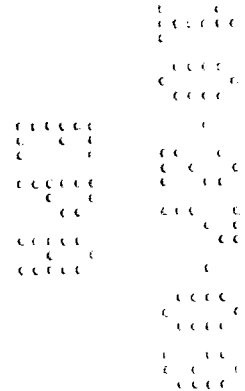
pgbrands.com [or www.pgproline.com]

MADE IN USA. Distributed by PROCTER & GAMBLE Cincinnati, OH 45202.

EPA Reg. No. 3573-54

EPA Est. No. 3573-MO-1 [or 52379-MI-002] [or a blank box in which the appropriate establishment number is ink-jetted at the manufacturing site. This option allows the flexibility to use one supply of product labels for product manufactured at multiple sites. The establishment number ink-jetted into this box would be 3573-MO-1 or 52379-MI-002 depending on where the product is manufactured.]

Patent statement



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Claims for Containers with Disinfecting Instructions (front, back or side label):

DISINFECTION	
<p>This product is a hospital use \ hospital grade \ hospital level \ medical environment disinfectant that kills \ eliminates \ destroys \ removes a broad \ wide range \ spectrum of bacteria <i>list of and/or options:</i></p> <ul style="list-style-type: none"> • Salmonella enterica (Salmonella) • Staphylococcus aureus (Staph) • Pseudomonas aeruginosa (Pseudomonas) • Proteus mirabilis (Proteus) • Escherichia coli \ E. coli <p>and virus <i>list of options:</i></p> <ul style="list-style-type: none"> • Avian Influenza A [virus] \ Avian Influenza A (H3N2) [virus] <p>Kills \ eliminates \ destroys \ removes and prevents the spread of <i>list of and/or options:</i></p> <ul style="list-style-type: none"> • Salmonella enterica (Salmonella) • Staphylococcus aureus (Staph) • Pseudomonas aeruginosa (Pseudomonas) • Proteus mirabilis (Proteus) • Escherichia coli \ E. coli • Avian Influenza A [virus] \ Avian Influenza A (H3N2) [virus] <p>Cleans and kills \ eliminates \ destroys \ removes <i>list of and/or options:</i></p> <ul style="list-style-type: none"> • Salmonella enterica (Salmonella) • Staphylococcus aureus (Staph) • Pseudomonas aeruginosa (Pseudomonas) • Proteus mirabilis (Proteus) • Escherichia coli \ E. coli • Avian Influenza A [virus] \ Avian Influenza A (H3N2) [virus] 	<ul style="list-style-type: none"> • Clean and disinfects • Disinfects as it cleans • One step cleaner and disinfectant • Disinfects [and deodorizes] • Restroom \ Bathroom disinfectant • Combines cleaning, disinfecting • Disinfecting cleaner • Disinfectant • Hospital Use \ Hospital Grade \ Hospital Level \ Medical Environment Disinfectant For use on commercial product only • Bactericide \ Bactericidal • Virucide \ Virucidal • Disinfects and deodorizes by killing bacteria [and controlling odors] • Cleans [and] [shines] [and] disinfects [and] [deodorizes] [washable] [restroom \ bathroom] [surfaces] [and] [fixtures] • One step cleaner & disinfectant • Respiratory illnesses attributable to Pandemic 2009 H1N1 are caused by influenza A virus. This product (Product Name) is a broad-spectrum hard surface disinfectant that has been shown to be effective against (influenza A virus tested and listed on the label) and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 (formerly called swine flu). • This product has demonstrated effectiveness against influenza A virus and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 influenza A virus. • This product has demonstrated effectiveness against (influenza A virus tested and listed on the label) and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 (formerly called swine flu). • Kills Pandemic 2009 H1N1 influenza A virus (formerly called swine flu). • Kills Pandemic 2009 H1N1 influenza A virus.

Additional claims (front, back or side label):

Note to Reviewer: Bold, italicized text is for reader clarity only. Bracketed [] text denotes optional text. Backslash \ denotes alternate text.

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 B

SANITIZING	
<ul style="list-style-type: none"> • Kills \ Eliminates \ Destroys \ Removes [and prevents the spread of] 99.9% of Staphylococcus aureus (Staph) and Enterobacter aerogenes (Enterobac) (<i>For products that require dilution only:</i>) when diluted 1:4 in the presence of 171 ppm hard water \ 10 gpg water hardness [and 5% fetal bovine serum]. • Kills \ Eliminates \ Destroys \ Removes [and prevents the spread of] 99.9% of bacteria (<i>For products that require dilution only:</i>) when diluted 1:4 in the presence of 171 ppm hard water \ 10 gpg water hardness [and 5% fetal bovine serum]. • Cleans and kills \ eliminates \ destroys \ removes 99.9% of bacteria (<i>For products that require dilution only:</i>) when diluted 1:4 in the presence of 171 ppm hard water \ 10 gpg water hardness [and 5% fetal bovine serum]. 	<ul style="list-style-type: none"> • Sanitizer • Antibacterial Cleaner • Cleaner / sanitizer • Sanitizing cleaner • Cleans and sanitizes • Sanitizes non-food contact surfaces • Leaves surfaces [clean and] sanitized

CLEANING AND DEODORIZING CLAIMS	
<ul style="list-style-type: none"> • Cuts through \ Eliminates \ Removes \ Cleans \ Dissolves tough soap scum [and hard water stains] [from bathtubs] [and] [showers] [and] [shower stalls] • Dissolves \ Cleans \ Cuts through tough [stains] [soap scum] [and] [hard water stains] • Removes \ Eliminates \ Cleans tough [stains] [soap scum] [and] [hard water stains] • Cleans [and] [shines] [and] [deodorizes] [washable] [restroom \ bathroom] [surfaces] [and] [fixtures] • Safely cleans restroom \ bathroom surfaces, such as counters, sinks, tubs, toilet exteriors, showers, floors, etc. • Cleans without scrubbing • Restrooms – great all-around restroom \ bathroom cleaner • Makes employee tasks simple, cutting through soap scum [and] [hard water stains]. • Designed to help improve cleaning productivity • Saves time – little to no scrubbing needed! • Minimizes training time 	<ul style="list-style-type: none"> • Deodorizer • Deodorizes • Freshens • Freshens \ Deodorizes as you clean • Powerful restroom \ bathroom cleaner • Penetrates [and dissolves] tough soap scum and hard water stains [without scrubbing] • Penetrates tough restroom \ bathroom soils without scrubbing • Non-abrasive • Safely cleans most surfaces • Designed to improve cleaning productivity • No scrubbing • Minimizes training time • Fewer products – no need for separate deodorizer • Non-abrasive [formula] [won't scratch surfaces] • Rinses away easily • Eliminates \ Removes odors caused by bacteria • Scum buster formula • Heavy duty formula • A clean you can trust • Makes employee tasks \ job \ life simple \ easy • Powers away soap scum and hard water stains in one step

Note to Reviewer: Bold, italicized text is for reader clarity only. Bracketed [] text denotes optional text. Backslash \ denotes alternate text.

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Additional claims (front, back or side label):

NON-PESTICIDAL CLAIMS	
<ul style="list-style-type: none">• Institutional [size] [use]• Professional Line \ Pro-Line• Commercial• Contains biodegradable ingredients \ cleaning agents• Not harmful to \ will not harm septic tanks• Suitable for septic tank systems [and] [wastewater systems] [and] [treatment plants]• Developed \ Formulated \ Designed for [institutional] [restroom \ bathroom] use• This product \ Product name complies with consumer volatile organic compound (VOC) \ VOC laws• [Contains] no bleach	<ul style="list-style-type: none">• A clean you can trust• Fresh \ pleasant scent <p><i>For closed chemical container only:</i></p> <ul style="list-style-type: none">• Tamper proof bottle• Bottle \ Sealed bottle \ Container \ Closed chemical system designed for employee safety• Bottle \ Sealed bottle \ Container \ Closed chemical system designed to prevent spills and accidental concentrate \ product exposure <p><i>For gallon size refill container and closed chemical container:</i></p> <ul style="list-style-type: none">• Concentrate <p><i>For gallon size refill container and closed chemical container that display dilution instructions to achieve sanitizing benefits:</i></p> <ul style="list-style-type: none">• 5X Concentrate <p><i>For spray container only:</i></p> <ul style="list-style-type: none">• For household use

Additional claims (front, back or side label):

WHERE TO USE	
<p>This product may be used on [washable] hard non-porous [non-food contact] [exterior] surfaces in <i>(list of and/or options)</i></p> <ul style="list-style-type: none"> • Foodservice establishments • Restaurants • Bars • Cafeterias • [institutional] kitchen exteriors \ exterior surfaces • fast food operations • food storage areas • medical environments • hospitals • nursing homes • medical and dental offices and clinics • operation rooms • isolation wards • medical research centers • ambulance • schools • colleges • dormitories • classrooms • athletic facilities • gymnasiums • locker rooms • day care centers • nurseries • retail establishments • supermarkets • convenience stores • dressing rooms • laundries • laundromats • office buildings • funeral homes 	<ul style="list-style-type: none"> • laboratories • recreational facilities • health clubs • household areas • kitchen exteriors \ exterior surfaces • bathrooms \ restrooms • basements • household garages • automotive garages • boats • ships • campers • RVs • Trailers • Mobile homes • Cars • Buses • Trains • Taxis • Airplanes • Transportation terminals • Veterinary clinics • Kennels • Breeding and grooming establishments • Pet \ animal quarters • Zoos • Pet shops • Churches • Manufacturing facilities • Military installations • Factories • Motels • hotels

Note to Reviewer: Bold, italicized text is for reader clarity only. Bracketed [] text denotes optional text. Backslash \ denotes alternate text.

