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3696-138

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

APR 17 1996

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

DowBrands L.P.
P. O. Box 68511
Indianapolis, IN
46268-0511

Attention: John G. Wood

Subject: Tough Act, The Heavy Duty Bathroom Cleaner
EPA Reg. No. 3696-138
Your Submission dated Jan. 11, 1996 and Feb. 12, 1996
EPA Received Date: February 14, 1996

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records.

However, as new labels are prepared, modify the statement, "A Rinse is recommended. . . with food" to read: "A Rinse is required. . . with food".

Additionally, the chemical identity of the surfactant in question, per our letter of January 26, 1996, has been received and made part of your file as a matter of record.

Sincerely,

A handwritten signature in cursive script, appearing to read "Marion J. Johnson, Jr.", written over a horizontal line.

Marion J. Johnson, Jr.
Product Manager (31)
Antimicrobial Program Branch
Registration Division (7505C)

2014

Front label:

TOUGH ACT® THE HEAVY DUTY BATHROOM CLEANER

REMOVES TOUGH SOAP SCUM EASILY!
CLEANS & SHINES WITHOUT SCRATCHING!
DISINFECTS AND DEODORIZES!
CUTS TOUGH KITCHEN GREASE!
LEAVES A STREAK FREE SHINE!
KILLS SALMONELLA CHOLERAESUIS (SALMONELLA)!
KILLS HOUSEHOLD GERMS AND ODOR-CAUSING GERMS!*

CAUTION: KEEP OUT OF REACH OF CHILDREN
See back panel for additional precautionary statements.

NET 17 FL. OZ. (1 PT. 1 OZ.) 502 mL

*See back panel for specific organisms.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

APR 17 1996

*Under the Pesticide Insecticide,
Fungicide, and Rodenticide Act
as amended, by the pesticide
regulation under EPA Reg. No.
3696-138*

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Back label:

TOUGH ACT® THE HEAVY DUTY BATHROOM CLEANER

WE WORK HARD SO YOU DON'T HAVE TO!
REMOVES TOUGH SOAP SCUM EASILY!
CLEANS & SHINES WITHOUT SCRATCHING!
CUTS TOUGH KITCHEN GREASE!
LEAVES A STREAK FREE SHINE!
DISINFECTS AND DEODORIZES!
KILLS HOUSEHOLD GERMS AND ODOR-CAUSING GERMS!

ACCEPTED
with COMMENTS
in EPA Letter 8000
APR 17 1990

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 3696-138

Directions For Use for trigger foamer:

Only Tough Act has SCRUBBING BUBBLES, whose foaming action thoroughly cleans, shines, disinfects and deodorizes. No scrubbing required. Specially formulated to attack soap scum, hard water stains and dirt. Controls mold and mildew growth on hard, nonporous surfaces. Kills common germs such as Staphylococcus aureus (Staph), Streptococcus pyogenes (Strep), Salmonella choleraesuis (Salmonella), Trichophyton mentagrophytes (athlete's foot fungus) on household surfaces. Effective on countertops*, appliances, cabinets, exhaust fans, microwave ovens, floors, ceramic tile, stainless steel, chrome, fiberglass, porcelain surfaces, tubs, showers, basins, and chrome fixtures. For all other surfaces, spot test in an inconspicuous area. Contains no abrasives, so it can't scratch surfaces. Leaves a brilliant shine and a fresh, clean scent.

DIRECTIONS FOR USE: It is a violation of federal law to use this product in a manner inconsistent with its labeling. To use, lift flap and lock into arrow on top of trigger foamer. Do not operate when flap is closed. **TO CLEAN**, hold 6-8 inches from surface. Spray with quick, full strokes. Allow foam to penetrate dirt and soap scum. Wipe with wet cloth or sponge, rinse with water. **TO DISINFECT**, reapply, covering entire surface with foam. Allow surface to remain wet for 10 minutes. **TO PREVENT MOLD AND MILDEW GROWTH** on hard, nonporous surfaces, spray thoroughly. Reapply as new growth appears. *A rinse is recommended for surfaces in direct contact with food.

Directions For Use for non-foamer trigger:

Tough Act has combined its powerful cleaners with antibacterial ingredients to kill bacteria such as Staphylococcus aureus (Staph), Streptococcus pyogenes (Strep), Salmonella choleraesuis (Salmonella), Trichophyton mentagrophytes (athlete's foot fungus) and odor causing germs. Now you can disinfect as you cut through even the toughest greasy dirt leaving surfaces with a sparkling streak-free shine. Your kitchen is left with a fresh lemon scent that makes it smell as clean as it looks. Controls mold and mildew growth on hard, nonporous surfaces. Effective on countertops*, appliances, cabinets, exhaust fans, microwave ovens, floors, ceramic tile, stainless steel, chrome, fiberglass, porcelain surfaces, tubs, showers, basins, and chrome fixtures. For all other surfaces, spot test in an inconspicuous area. Contains no abrasives, so it can't scratch surfaces.

DIRECTIONS FOR USE: It is a violation of federal law to use this product in a manner inconsistent with its labeling. **TO USE**, lift flap and lock into arrow on top of trigger. Do not operate when flap is closed. **FOR GENERAL HOUSEHOLD CLEANING**, hold 6-8 inches from surface, spray surface then wipe with a dry paper towel or lint-free cloth. No rinsing necessary. **TO DISINFECT/DEODORIZE**, reapply, covering entire surface with spray. Allow surface to remain wet for 10 minutes. **TO PREVENT MOLD AND MILDEW GROWTH**, on hard, nonporous surfaces, spray thoroughly. Reapply as new growth appears. Do not use on eating utensils, plates or glasses. *A rinse is recommended for surfaces in direct contact with food.

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Back label (cont.)

PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS AND DOMESTIC ANIMALS: CAUSES EYE IRRITATION. Avoid contact with eyes. **FIRST AID:** In case of contact, immediately flush eyes with plenty of water. Get medical attention if irritation persists. **STORAGE:** Store out of the reach of children. **DISPOSAL:** Do not reuse empty container, discard in trash.

Active ingredients:

n-Alkyl (60% C14, 30% C16, 5% C12, 5% C18) dimethyl benzyl ammonium chlorides.....	0.1%
n-Alkyl (68% C12, 32% C14) dimethyl ethylbenzyl ammonium chlorides.....	0.1%
Inert ingredients (includes detergents and cleaners).....	99.8%

Contains no bleach or phosphates. Safe for septic systems.

EPA Reg. No. 3696-138. EPA Est. 11525-IL-1^B, 3696-OH-1^C, 3696-SC-1^D.
Superscript letter used at the end of the Lot Code.

Questions? Comments?
Call TOLL-FREE
1-800-428-4795

DowBrands L.P.
P.O. Box 68511
Indianapolis, IN 46268-0511

*Trademark of The Dow Chemical Company
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Bottle made of 25% Post Consumer Plastic

ACCEPTED
with COMMENTS
In EPA Letter Dated

APR 17 1996

Under the Federal Insecticide, Fungicide, and Herbicide Act as amended for the pesticide registered under EPA Reg. No. 3696-138