

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAR 10 1997

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

Subject: Tough Act The Heavy Duty Bathroom Cleaner  
EPA Registration No. 3696-138  
Notification Per PR-Notice 95-2

Dear Ms. Baugh:

This will acknowledge receipt of your notification, of an additional brand name (Dow All Purpose Cleaner Fantastik\*), submitted under the provisions of FIFRA section 3 (c) 9. Based on a review of the submitted material, the following comments apply.

The application is acceptable and the notification has been made a part of the records for this file.

Sincerely,

Wanda Y. Mitchell  
Notification Coordinator  
Antimicrobial Program Branch  
Registration Division (7505)

CONCURRENCES

SYMBOL	7505C						
SURNAME	Mitchell						
DATE	3/10/97						

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

278

MAR 10 1997

2:42-105

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

Subject: Tough Act The Heavy Duty Bathroom Cleaner  
 EPA Registration No. 3696-138  
 Notification Per PR-Notice 95-2

Dear Ms. Baugh:

This will acknowledge receipt of your notification, of an additional brand name (Dow All Purpose Cleaner Lemon Power\* Fantastik\*), submitted under the provisions of FIFRA section 3 (c) 9. Based on a review of the submitted material, the following comments apply.

The application is acceptable and the notification has been made a part of the records for this file.

Sincerely,


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SYMBOL	7505C						
SURNAME	Mitchell						
DATE	3/10/97						

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 05-31-98

 United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number <div style="font-size: 24pt; text-align: center;">245632</div>
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**Application for Pesticide - Section I**

1. Company/Product Number <div style="text-align: center;">3696-138</div>	2. EPA Product Manager Marion Johnson	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Tough Act The Heavy Duty Bathroom Cleaner	PM# Team #31	
5. Name and Address of Applicant (Include ZIP Code) DowBrands L.P. P.O. Box 68511 Indianapolis, IN 46268-0511 <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. _____ <b>NOTIFICATION</b> _____ Product Name _____

**Section - II**

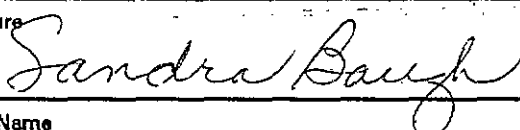
<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/>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

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.) FQPA NOTIFICATION  
 Notification of 2 additional brand names and minor label changes allowed under PR Notice 95-2.  
 Additional brand names are: Dow All Purpose Cleaner Fantastik\*  
 Dow All Purpose Cleaner Lemon Power\* Fantastik\*  
 \*Trademark of DowBrands

**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 checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt.    No. per container	If "Yes" Package wgt    No. per container		
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16, 17, 22, 32, 64 FL.OZ.		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
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 plastic label		

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Sandra K. Baugh	Title Regulatory Affairs Specialist	Telephone No. (Include Area Code) (317) 873-7400
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.		Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Affairs Specialist	
4. Typed Name Sandra K. Baugh	5. Date February 5, 1997	

February 5, 1997

**FQPA NOTIFICATION**



Mr. Marion Johnson (PM#31)  
Antimicrobial Branch  
Registration Division (H7505C)  
U.S. Environmental Protection Agency  
401 M. Street, SW  
Washington, DC 20460

**NOTIFICATION**

**RE: TOUGH ACT THE HEAVY DUTY BATHROOM CLEANER  
EPA REG. NO. 3696-138  
FQPA NOTIFICATION OF MINOR LABEL TEXT CHANGES  
AND 2 ADDITIONAL BRAND NAMES**

Dear Mr. Johnson:

DowBrands is submitting notification of minor label text changes and two additional brand names as allowed under EPA PR Notice 95-2 to Tough Act The Heavy Duty Bathroom Cleaner, EPA Reg. No. 3696-138. Per EPA PR Notice 95-2, one copy of the revised label is attached with the label changes highlighted in yellow for your convenience. The revisions do not require supporting data.

- 1. Additional brand names for EPA Reg. No. 3696-138:

Dow All Purpose Cleaner Fantastik®  
Dow All Purpose Cleaner Lemon Power® Fantastik®

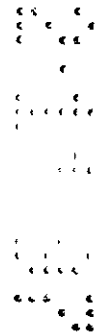
- 2. Per PR Notice 95-2, the notification includes the following minor label changes:

Front Label:

- A. Minor label text:

KILLS GERMS†  
KILLS HOUSEHOLD GERMS† AND ODOR-CAUSING GERMS!  
STREAK FREE  
NOW KILLS GERMS!†

- B. Graphics:



NOTIFICATION

February 5, 1997  
Page 2

Front and Back Label:

- A. Per a letter dated 10/03/96 from Jim Downing, Labeling Unit Team Leader, ...ambiguous and generic claims of efficacy such as "kills germs" are not acceptable. By adding the "+" to each reference of "germs" or "kills germs" on the front and back label panels, we have properly qualified this statement to be consistent with the Agency's policy on this type of claim.

Back Label:

- A. Minor label text:

KILLS HOUSEHOLD GERMS<sup>†</sup> AND ODOR-CAUSING GERMS!

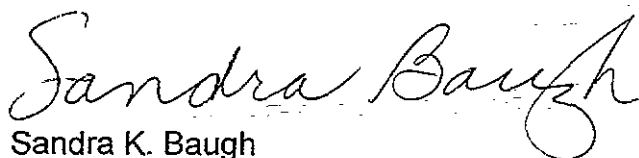
- B. Minor label text: On the last page of the typed label text (back label), in the second paragraph of marketing text add:

Dow brings you... • *Fresh clean scent*

- 3. Please note: We have reformatted all alternative marketing text directly above the **DIRECTIONS FOR USE** sections for your convenience. Each alternative marketing text paragraphs are separated by the word "**or**".
- 4. 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 18 U.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.

If you have any questions, please call me at (317) 873-7400.

Sincerely,



Sandra K. Baugh  
Regulatory Affairs Specialist

Attachments

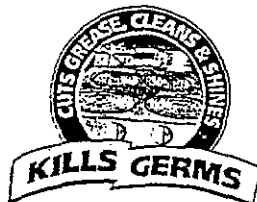
Front label:

# 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!  
 LIGHT FRESH SCENT  
 KILLS STAPHYLOCOCCUS AUREUS (STAPH),  
 STREPTOCOCCUS PYOGENES (STREP), AND  
 SALMONELLA CHOLERAESUIS (SALMONELLA)  
 CUTS GREASE  
 STREAK FREE  
 CLEANS & SHINES  
 CLEANS & DISINFECTS  
 KILLS GERMS†  
 NOW KILLS GERMS!†  
 MAXIMUM CLEAN PLUS ANTIBACTERIAL



OR



OR



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

NET 16 FL. OZ. (1 PT.) 473mL  
 NET 17 FL. OZ. (1 PT. 1 OZ.) 502 mL  
 NET 22 FL. OZ. (1 PT. 6 OZ.) 650 mL  
 NET 32 FL. OZ. (2 PT.) 946 mL  
 or NET 64 FL. OZ. (2 QTS.) 1.89 L

†See back panel for specific organisms.

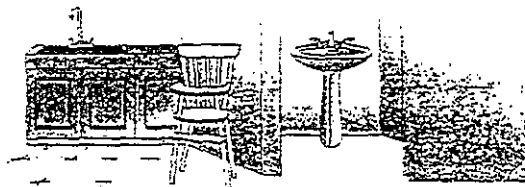
# TOUGH ACT® THE HEAVY DUTY BATHROOM CLEANER

NOTIFICATION

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!  
CLEANS, SHINES, DISINFECTS, DEODORIZES NO-SCRATCH FORMULA

Dow has a cleaning solution for every room in your home:

- Dow Bathroom Cleaner with Scrubbing Bubbles®
- Dow Glass Plus® Glass & Surface Cleaner
- Dow Fantastik® All Purpose Cleaner
- Dow Spray'n Wash® Laundry Stain Remover
- Dow Vivid® Color Safe Bleach
- Dow Yes® Laundry Detergent
- Dow Smart Cleanser™ Soft Cleanser
- Dow Oven Cleaner



For the entire house

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, sinks, 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.

or

This DOW product does it all -- cleans, shines, deodorizes and disinfects -- for a complete clean. Unlike ordinary cleaners and disinfectants, this effective, versatile cleaner not only wipes out tough grease and grime, it kills food-related bacteria and odor-causing germs such as *Salmonella choleraesuis* (Salmonella), *Streptococcus pyogenes* (Strep), *Staphylococcus aureus* (Staph), and *Trichophyton mentagrophytes* (Athlete's Foot Fungus) all around the house, even on glass.

For the first time ever, the cleaning experts at Dow have combined the latest cleaning technology with *antibacterial disinfectants*, so there's nothing left behind but a brilliant, streak-free shine, plus a light fresh scent. You can be sure your home not only *looks* clean, it's completely clean.

EFFECTIVE ON countertops\*, appliances, cabinets, exhaust fans, microwave ovens, floors, ceramic tile, stainless steel, chrome, fiberglass, porcelain surfaces, tubs, showers, sinks, basins, and chrome fixtures. Shines glass and shiny surfaces. For all other surfaces, spot test in an inconspicuous area.

or

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, sinks, basins, and chrome fixtures. For all other surfaces, spot test in an inconspicuous area. Contains no abrasives, so it can't scratch surfaces.

or

Dow brings you this powerful, scientifically advanced product that does it all - cuts grease streak-free and kills germs† such as Salmonella choleraesuis (Salmonella), Streptococcus pyogenes (Strep), Staphylococcus aureus (Staph), and Trichophyton mentagrophytes (Athlete's Foot Fungus). The cleaning experts at Dow combined the streak-free, grease cutting power of Tough Act with antibacterial disinfectants so you can get the maximum clean for your home.

• Maximum cleaning power • Cuts tough kitchen grease • Maximum streak-free shine • Kills household germs • Fresh clean scent • Fresh clean citrus scent.

Effective on: Countertops\*, Sinks, Appliances, Cabinets, Microwave Ovens, Floors, Ceramic Tile, Stainless Steel, Chrome, Fiberglass, Porcelain Surfaces and More - Tubs, Showers, Basins, and Chrome Fixtures. For all other surfaces, spot test in an inconspicuous area.

Directions For Use for trigger foamer:

**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 required for surfaces in direct contact with food.

Directions For Use for non-foamer trigger

**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 required for surfaces in direct contact with food.

**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 .....	0.11%
n-Alkyl (68% C12, 32% C14) dimethyl ethylbenzyl ammonium chlorides .....	0.11%
Inert ingredients (includes detergents and cleaners) .....	99.78%

Contains no bleach or phosphates. Safe for septic systems.

EPA Reg. No. 3696-138. EPA Est. No. 11525-IL-1<sup>B</sup>, 3696-OH-1<sup>C</sup>, 3696-SC-1<sup>D</sup>, 0468113-CN-6<sup>F</sup>, 10744-IL-1<sup>G</sup>.

The superscript letter is to be used at the end of the Lot Code.

Questions? Comments?  
Call TOLL-FREE 1-800-426-4795

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

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Bottle made of 25% Post Consumer Plastic

**NOTIFICATION**