

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

AUG 06 1997

SUBJECT: Tough Act the Heavy Duty Bathroom Cleaner
EPA Registration Number 3696-138
Your Submission Dated February 5, 1997
EPA Received Date February 11, 1997

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the addition of nine organisms to the product labeling, is acceptable with the following comments:

1. Amend the Directions for Use section of the label for the trigger foamer product, specifically, the "To Disinfect,..." directions must indicate if and how the product should be removed from the surface after the recommended "...10 minutes" exposure period. Likewise, for the non-foamer trigger product, the "To Disinfect/Deodorize,..." section of the Directions for Use should be amended to indicate if and how the product should be removed after the recommended exposure period.

2. Submit (5) five draft labels incorporating the revisions referred to above.

The Agency acknowledges your compliance with our request, as noted in previous EPA correspondence dated March 7, 1997, to submit revised labeling which moves the Ingredients Statement from the back panel label to the correct location on the front panel label.

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

If you have any questions concerning this letter, please contact Julie Fairfax at (703) 308-9086.

Sincerely,



Velma Noble
Acting Product Manager (31)
Regulatory Management Branch I
Antimicrobials Division (7510W)

CONCURRENCES

SYMBOL	7510W						
SURNAME	J. Fairfax						
DATE	8/5/97						

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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
 CUTS GREASE
 CLEANS & SHINES
 CLEANS & DISINFECTS
 KILLS GERMS†
 MAXIMUM CLEAN PLUS ANTIBACTERIAL
 KILLS VIRUSES*
 VIRUCIDAL*

KILLS STAPHYLOCOCCUS AUREUS (STAPH)
 STREPTOCOCCUS PYOGENES (STREP)
 SALMONELLA CHOLERAESUIS (SALMONELLA)
 PSEUDOMONAS AERUGINOSA (PSEUDOMONAS)
 TRICHOPHYTON MENTAGROPHYTES (ATHLETE'S FOOT FUNGUS)
 ESCHERICHIA COLI (E. COLI)
 CAMPYLOBACTERIA JEJUNI
 SHIGELLA DYSENTERIAE

VIRUSES* SUCH AS HERPES SIMPLEX VIRUS TYPE 1 (CAUSES COLD SORES)
 HERPES SIMPLEX VIRUS TYPE 2 (CAUSES GENITAL HERPES)
 INFLUENZA A₂ (HONG KONG)
 RESPIRATORY SYNCYTIAL VIRUS (RSV)
 RHINO VIRUS TYPE 37

ACCEPTED
 with COMMENTS
 in EPA Letter Dated:

AUG - 6 1997

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

3696-138

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Front Label (Continued)

DowBrands



OR



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.

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

- NET 16 FL. OZ. (1 PT.) 473 mL
- 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.) 1.89L

*See back panel for specific viruses.
†See back panel for specific organisms.

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AUG - 6 1997

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
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registered under EPA Reg. No.

3696-138

Back label:

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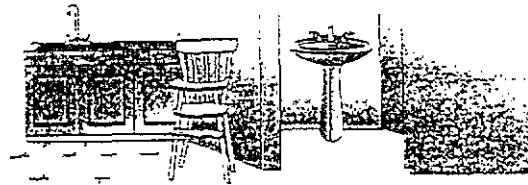


TOUGH ACT® THE HEAVY DUTY BATHROOM CLEANER

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!
 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



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

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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), Pseudomonas aeruginosa (Pseudomonas), and viruses* such as Herpes simplex virus type 1 (causes cold sores), Herpes simplex type 2 (causes genital herpes), Influenza A₂ (Hong Kong), Respiratory syncytial virus (RSV), Rhino virus type 37, Escherichia coli (E. coli), Campylobacteria jejuni, and Shigella dysenteriae on environmental 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), Pseudomonas aeruginosa (Pseudomonas), and viruses* such as Herpes simplex virus type 1 (causes cold sores), Herpes simplex type 2 (causes genital herpes), Influenza A₂ (Hong Kong), Respiratory syncytial virus (RSV), Rhino virus type 37, Escherichia coli (E. coli), Campylobacteria jejuni, and Shigella dysenteriae on environmental surfaces all around the house, plus leaves a shine.

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.

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Back label (Continued):



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), Pseudomonas aeruginosa (Pseudomonas), and odor causing germs and viruses* such as Herpes simplex virus type 1 (causes cold sores), Herpes simplex type 2 (causes genital herpes), Influenza A₂ (Hong Kong), Respiratory syncytial virus (RSV), Rhino virus type 37, Escherichia coli (E. coli), Campylobacteria jejuni, and Shigella dysenteriae on environmental surfaces. 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), Pseudomonas aeruginosa (Pseudomonas), and viruses* such as Herpes simplex virus type 1 (causes cold sores), Herpes simplex type 2 (causes genital herpes), Influenza A₂ (Hong Kong), Respiratory syncytial virus (RSV), Rhino virus type 37, Escherichia coli (E. coli), Campylobacteria jejuni, and Shigella dysenteriae on environmental surfaces. 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 • Maximum streak-free shine • Kills household germs • 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. TO REFILL: Remove trigger sprayer from empty bottle. Unscrew cap on refill and pour contents directly into empty bottle. Replace trigger sprayer and use as you normally would.

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. TO REFILL: Remove trigger sprayer from empty bottle. Unscrew cap on refill and pour contents directly into empty bottle. Replace trigger sprayer and use as you normally would.

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

EPA Reg. No. 3696-138. EPA Est. No. 11525-IL-1², 3696-OH-1², 3696-SC-1², 0468113-CN-5², 10744-IL-1².
The superscript letter is to be used at the end of the Lot Code.

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

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™®Trademark of DowBrands Inc.
Bottle made of 25% Post Consumer Plastic

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DowBrands L.P. 9550 North Zionsville Road Post Office Box 68511 Indianapolis, IN 46268-0511 (317) 873-7000

