S.C. Johnson & Son, Inc. 1525 Howe Street Racine. WI 53403-2236

MAY 1 6 2000

ATTENTION: Kelly K. Rahn

SUBJECT:

S. C. Johnson Wax Toilet Duck

EPA Registration Number 4822-370

Your Amendment Dated: February 11, 2000 EPA Received Date: February 16, 2000

The amendment referred to above, submitted in connection with registration under FIFRA as amended, is acceptable provided that you:

- 1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
- A. Add the phrase "Total......100%" to the ingredients statement on the Toilet Duck and Toilet Duck Refill sections of the label.
- B. Make the following revision to both the Toilet Duck and Toilet Duck Refill sections of the label.
- 1. Delete the term "New". This term was previously allowed (1993) for a period of six months.
- 2. The reference to the abbreviation "staph" is unacceptable. Your label must list the name of the organism in it's entirety immediately followed by "staph." "Staph" may not be used alone. Revise the label to state: "Staphylococcus aureus (staph)". In addition, revise the end of this phrase as follows: "Kills household germs including Staphylococcus aureus (staph) in the toilet bowl."

3. Delete the phrase "Bleachasterna". This phrase is misleading since your								
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EPA Form 1320-1A (1/90)

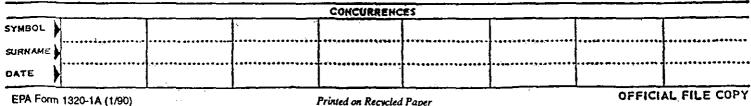
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- 4. Delete the reference to the word "Safe" and revise as follows: "Will not harm white and colored bowls."
- C. Make the following revisions to the "Directions for Use" of the Toilet Duck section of the label.
- 1. Your label states that this product deodorizes. Thus the heading "To clean and freshen" must be revised to state "To clean and deodorize."
- 2. Revise the statement "Apply evenly all around bowl and scrub including under the rim." to read "Apply evenly all around bowl and scrub the entire surface including under the rim." Revise this statement in the "To clean and deodorize" as well as the "To disinfect" section of the label.
- D. Revise the Statement of Practical Treatment in both the Toilet Duck and Toilet Duck Refill sections of the label as follows:
- 1. Revise the phrases "IF IN EYES:" and "IF ON SKIN:" such that the entire phrase is in upper case letters. Place the statements such that each begins at the far left margin.
- 2. Revise the "IF ON SKIN:" statement to reflect Acute Dermal Toxicity III by changing "Get medical attention if irritation persists." to read "Get medical attention."
- E. Revise the Storage and Disposal Statement in both the Toilet Duck and Toilet Duck Refill sections of the label by deleting the word "and" and the end of the phrase "Store in a cool, dry area inaccessible to children and."
- F. Revise the Toilet Duck Refill section of the label by including the phrase "For Use Only with S.C. Johnson Wax Toilet Duck"
- G. Revise the Toilet Duck Refill section of the label by modifying the Disposal statement to read as follows: "Do not reuse empty container. To discard empty container wrap container and put in trash." deleting the phrase "except when using refill pack Toilet Duck." since this phrase is only applicable to the Toilet Duck and not the Toilet Duck refill.

Alternate Brand Names

As stated in the Agency letter of 11/30/99 you must reapply for any desired alternate brand names via notification. Upon further review, in addition to our previously mentioned concerns regarding the proposed alternate brand name "Home Guard Toilet Bowl Cleaner", "Bactrol 24/7 Toilet Bowl Cleaner" is also unacceptable since it implies continual "24/7" control of bacteria in the toilet bowl. Your label and data do not provide evidence of residual activity for this product. The Agency has no objections to the proposed names "Bactrol Toilet Bowl Cleaner" and "Bactrol 99.9 Toilet Bowl Cleaner" although these names will not be made part of the record for this file until the Agency has accepted a notification for these alternate brand names.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Note that the name of record for this product is "S.C. Johnson Wax Toilet Duck." Your Application for Pesticide and cover letter do not include the word "Wax."

2. Submit two (2) copies of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records. Should you have any questions concerning this letter, please contact Tracy Lantz at (703) 308-6415.

Sincerely,

Velma Noble

Product Manager (31)

Regulatory Management Branch I Antimicrobials Division (7510C)

Enclosure: Stamped Label

7510C:T.Lantz:5/15/00:4822-370a

CONCURRENCES							
SYMBOL	٠						
SURNAME							
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EPA Form 1320-1A (1/90)

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S. C. JOHNSON WAX TOILET DUCK

(THE PATENTED "DUCK" NECK REACHES UNDER THE RIM WHERE BACTERIA HIDE. ALSO CLEANS THE GRUNGIES.)

Thick Liquid Toilet Bowl Cleaner and Disinfectant (Cleans and Disinfects) (Cleaner and Disinfectant)

Clean Fresh (Lemon Fresh) (Spring Fresh) (Pine Fresh) (Potpourri-Country Garden) (Powder Fresh) (Citrus Fresh) (Country Fresh) Scent

ACTIVE INGREDIENTS:

n-Alkyl (60% C ₁₄ , 30% C ₁₆ , 5% C ₁₂ , 5% C ₁₈) dimethyl	
benzyl ammonium chlorides	0.20%
n-Alkyl (68% C ₁₂ , 32% C ₁₄) dimethyl ethylbenzyl	
ammonium chlorides	0.20%
INERT INGREDIENTS	

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back label for additional precautionary statements

ACCEPTED with COMMENTS in EPA Letter Dated: MAY 1 6 2000

Under the Federal Insecticide, Pangicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 48 22 - 370 New! Toilet Duck

Thick Liquid Toilet Bowl Cleaner and Disinfectant. Thick Liquid Disinfectant Toilet Bowl Cleaner. Contains no phosphates (Phosphate Free). Non-acid formula. Disinfects and Deodorizes. Kills household germs including staph. in bathroom bowl. Kills odor causing bacteria. Removes rust and mineral deposits. Removes hard water stains. Resists hard water build-up. Removes lime deposits. Has no fumes or noxious odors. Bleaches away stains. Leaves no streaks. Whitens bowl. Removes tough, stubborn stains. Penetrates, breaks-up and dissolves stains. Removes bowl ring build-up. Freshens toilet bowl. Leaves a Clean Fresh (Lemon Fresh) (Spring Fresh) (Pine Fresh) (Potpourri-Country Garden) (Powder Fresh) (Citrus Fresh) (Country Fresh) Scent. Will not harm plumbing or septic tanks. Safe on white and colored bowls. Repels dirt. Absorbs odors. Resists build-up. Cleans off water spots. Disinfects the toilet bowl. Leaves surfaces nice and shiny. Is non-caustic, Dissolves stains. Does not scratch surfaces. Cleans under the rim. Cleans the entire bowl. Gets the product under the rim. Coats above and below the water line. Clings to surfaces. Leaves the whole bathroom smelling fresh and clean. Thick, heavy-duty liquid. Cleans and deodorizes. Liquid disinfectant toilet bowl cleaner. Combination of cleaning and freshening. Is not hard to rinse. Leaves the toilet bowl sparkling clean. Does not damage porcelain. Leaves toilet bowl disinfected. Preferred angle neck bottle. Freshens while it cleans. Cleans and freshens. Easy open cap.

New Toilet Duck bowl cleaner makes cleaning easier. The unique patented duck neck applicator lets you reach under the rim. You can't kill the bacteria that you don't reach. The thick Toilet Duck formula clings to coat the whole bowl to remove even the most stubborn, grungy stains. Clean Fresh (Lemon Fresh) (Spring Fresh) (Pine Fresh) (Potpourri-Country Garden) (Powder Fresh) (Citrus Fresh) (Country Fresh) scent Toilet Duck leaves the bowl disinfected and the whole bathroom smelling fresh and clean. Unlike other toilet bowl bottles, Toilet Duck traps the liquid in its unique patented duck neck allowing you to clean up under the rim even when bottle is nearly empty. Refillable bottle.

Toilet Duck is recommended for use in schools and colleges, veterinary clinics, animal life science laboratories, hotels and households.

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Prior to application of this product, remove gross filth and heavy soils from toilet bowl.

To clean and freshen:

- 1. To open, pull top portion of cap up.
- 2. Tilt bottle forward and fill the neck. Specially designed duck neck applicator allows you to apply under the rim, even when the bottle is almost empty. Hold bottle with opening directly under the rim and squeeze to direct 4 ounces (or three

ACCEPTED with COMMENTS in 1974 Letter Dated:

MAY 16 2000

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neck fills) of product. Apply evenly all around bowl and scrub including under the rim.

- 3. Brush and flush clean.
- 4. Close cap after use.

To disinfect:

- 1. To open, pull top portion of cap up.
- 2. Tilt bottle forward and fill the neck. Specially designed duck neck applicator allows you to apply under the rim, even when the bottle is almost empty. Hold bottle with opening directly under the rim and squeeze to direct 4 ounces (or three neck fills) of product. Apply evenly all around bowl and scrub including under the rim.
- 3. Let stand for 10 minutes.
- 4. Brush and flush clean.
- 5. Close cap after use.

To use the refill pack:

- 1. Remove cap from empty Toilet Duck bottle.
- 2. Remove cap from refill.
- 3. Place empty Toilet Duck bottle over opening of refill.
- 4. Return Toilet Duck bottle to its upright position. Continue filling until Toilet Duck is full. Replace cap.
- 5. If liquid remains in refill bottle, replace cap. Store for future use.

NOTE: Do not use in combination with other household chemicals.

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

CAUTION: Causes moderate eye irritation. Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

ACCEPTED with COMMENTS in EPA Letter Dated:

MAY 1 6 2000

Inder the Federal Insecticide.

Angicide, and Rodenticide Act as mended, for the pesticide, egistered under EPA Reg. No. 4300 - 370

STATEMENT OF PRACTICAL TREATMENT: If in eyes: Flush eyes with plenty of water. Call a physician if irritation persists. If on skin: Wash with plenty of soap and water. Get medical attention if irritation persists.

STORAGE AND DISPOSAL:

Do not contaminate water, food, or feed by storage and disposal.

STORAGE: Store in a cool, dry area inaccessible to children and.

DISPOSAL: Do not reuse empty container except when using refill pack Toilet Duck.

To discard empty container wrap container and put in trash.

EPA Reg. No. 4822-370 EPA Est. No. 4822-WI-1

Net Contents: 12 to 32 fl. oz.

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ACCEPTED with COMMENTS in EPA Letter Dated:

MAY 16 2000

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 4822-370

50% LESS PLASTIC TO DISCARD

REFILL PACK FOR S. C. JOHNSON WAX TOILET DUCK

(WITH THE PATENTED "DUCK" NECK REACHES UNDER THE RIM WHERE BACTERIA HIDE. ALSO CLEANS THE GRUNGIES.)

Thick Liquid Toilet Bowl Cleaner and Disinfectant
(Cleans and Disinfects)
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INERT INGREDIENTS	

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back label for additional precautionary statements

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TOILET DUCK REFILL

Thick Liquid Toilet Bowl Cleaner and Disinfectant

Refill will provide ½ to 2 fills

New! Toilet Duck

Thick Liquid Toilet Bowl Cleaner and Disinfectant. Thick Liquid Disinfectant Toilet Bowl Cleaner. Contains no phosphates (Phosphate Free). Non-acid formula. Disinfects and Deodorizes. Kills household germs including staph. in bathroom bowl. Kills odor causing bacteria. Removes rust and mineral deposits. Removes hard water stains. Resists hard water build-up. Removes lime deposits. Has no fumes or noxious odors. Bleaches away stains. Leaves no streaks. Whitens bowl. Removes tough, stubborn stains. Penetrates, breaks-up and dissolves stains. Removes bowl ring build-up. Freshens toilet bowl. Leaves a Clean Fresh (Lemon Fresh) (Spring Fresh) (Pine Fresh) (Potpourri-Country Garden) (Powder Fresh) (Citrus Fresh) (Country Fresh) Scent. Will not harm plumbing or septic tanks. Safe on white and colored bowls. Repels dirt. Absorbs odors. Resists build-up. Cleans off water spots. Disinfects the toilet bowl. Leaves surfaces nice and shiny. Is non-caustic. Dissolves stains. Does not scratch surfaces. Cleans under the rim. Cleans the entire bowl. Gets the product under the rim. Coats above and below the water line. Clings to surfaces. Leaves the whole bathroom smelling fresh and clean. Thick, heavy-duty liquid. Cleans and deodorizes. Liquid disinfectant toilet bowl cleaner. Combination of cleaning and freshening. Is not hard to rinse. Leaves the toilet bowl sparkling clean. Does not damage porcelain. Leaves toilet bowl disinfected. Freshens while it cleans. Cleans and freshens.

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Toilet Duck is recommended for use in schools and colleges, veterinary clinics, animal life science laboratories, hotels and households.

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

- 6. Remove cap from empty Toilet Duck bottle.
- 7. Remove cap from refill.

ACCEPTED. Place empty Toilet Duck bottle over opening of refill. with COMMENTS in EPA Letter Dated:

MAY 16 2000

Inder the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 4822-370

- 9. Return Toilet Duck bottle to its upright position. Continue filling until Toilet Duck is full. Replace cap.
- 10. If liquid remains in refill bottle, replace cap. Store for future use.
- 6. Use product according to label directions on Toilet Duck bottle.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Causes moderate eye irritation. Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

STATEMENT OF PRACTICAL TREATMENT: If in eyes: Flush eyes with plenty of water. Call a physician if irritation persists. If on skin: Wash with plenty of soap and water. Get medical attention if irritation persists.

STORAGE AND DISPOSAL:

Do not contaminate water, food, or feed by storage and disposal. STORAGE: Store in a cool, dry area inaccessible to children and. DISPOSAL: Do not reuse empty container except when using refill pack Toilet Duck. To discard empty container wrap container and put in trash.

EPA Reg. No. 4822-370 EPA Est. No. 4822-WI-1

Net Contents: 8 to 32 fl. oz.

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Under the Federal Insecticide,
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