

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

FEB 29 2000

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

Subject: BD1
EPA Registration No. 4822-484
Amendment Date: 11/05/99
EPA Receive Date: 11/05/99

Attention: Ms. Christine Benter,
Registration Specialist

The amendment referenced above, submitted in connection with registration under FIFRA, as amended, is acceptable provided that the following recommendations are addressed prior to the release of the product for shipment.

EFFICACY

In 1993, a protocol for evaluating residual antibacterial activity for BD1 was submitted to the Agency for review. The acceptance of the protocol was for residual self-sanitizing activity of dried chemical residue on undisturbed hard, inanimate surfaces where abrasion is not likely. On January 27, 1999, the Agency accepted the data for residual self-sanitizing activity of BD1 against *Staphylococcus aureus*, *Escherichia coli*, and *Klebsiella pneumoniae*, and residual anti-mold and mildew against *Aspergillus niger* at an initial contact time of 1 minute in the presence of 5% organic soil with a residual effect for up to 14 days. The data was generated on surfaces which were subjected to multiple rinses (such as a shower); however, an evaluation of the effect of abrasion from multiple touches was not conducted. Therefore, you will need to indicate that the 14 day residual effect is efficacious when the surfaces remains undisturbed and untouched.

Label Recommendations

- 1. Revise the phrase, "on hard surfaces," to read "on hard, inanimate, environmental surfaces". This revision should be made wherever this phrase appears on the label.

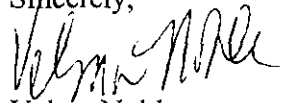
CONCURRENCES							
SYMBOL	75702						
SURNAME	Campbell						
DATE	2/29/00						

2. Revise the phrase, "for up to 14 days" by adding "on undisturbed and untouched hard, inanimate environmental surface". This revision should be made everywhere this phrase appears on the label.
3. Revise the phrase, "most household germs," to read "many household germs." This revision should be made everywhere this phrase appears on the label.
4. Revise the statement, "BD1 stops many bacteria (from coming back) (for up to 14 days)" to read "BD1 stops *Escherichia coli*, *Staphylococcus aureus*, and *Klebsiella pneumonia* from coming back for up to 14 days on undisturbed and untouched hard, environmental surfaces such as shower stalls, tubs, and counters.
5. Revise the statement, "Residual self-sanitizing for up to 14 days" to read "Residual self-sanitizing against *Escherichia coli*, *Staphylococcus aureus*, and *Klebsiella pneumonia* from coming back for up to 14 days on undisturbed and untouched hard, environmental surfaces such as shower stalls, tubs, and counters.
6. Since data has been approved demonstrating this product's effectiveness against bacteria, viruses, and fungi, the claim, "kills many germs" for the disinfectant activity only is acceptable. This claim can not be made for the residual activity claims.
7. 8th claim, Revise "(athlete's foot fungus (or *Trichophyton mentagrophytes*), (on hard surfaces)" to read "(*Trichophyton mentagrophytes*, the fungus that causes athletes foot) on hard nonporous environmental surfaces."
8. The surface, tile, needs to be qualified as a hard, non-porous surface by stating "glazed tile".
9. Directions For Use
 - a. This section should be rearranged by increasing levels of efficacy: To clean, To control Mold and Mildew, Residual Self-Sanitizing Activity, Disinfection.
 - b. The disinfection directions must be separated from the residual self-sanitizing directions.
 - c. The residual self-sanitizing directions should state: Spray surface until thoroughly wet. Leave for at least 1 minute before wiping. For heavily soiled surfaces, first clean surface according to Clean directions. This product is residually effective on undisturbed and untouched hard, environmental surfaces such as shower stalls and ... (add additional use sites) for up to 14 days.

3 9 7

A stamped label is enclosed. You should submit one (1) copy of the final printed label before you release this product for shipment. If you have any questions regarding this letter, please contact Jacqueline Campbell at (703) 308-6416.

Sincerely,



Velma Noble

Product Manager (31)

Regulatory Management Branch I

Antimicrobials Division (7510C)

11/5/99 - Please note: Words/phrases underlined are only to indicate changes as discussed in November 5, 1999 cover letter.

BD1
S.C. Johnson
(A Family Company)

Disinfectant (Antibacterial) (Kitchen) (Basin, Tub & Tile) (Bathroom) (Household) Cleaner
Multi-purpose Disinfectant (Antibacterial) Cleaner

NEW

(Unscented) (Country Garden) (Original Scent) (RainShower Fresh) (Mountain Breeze) (Spring Fresh) (Lemon) (Pine) (Citrus)

ACTIVE INGREDIENTS

n-Alkyl (60% C14, 30% C16, 5% C12, 5% C18) dimethyl benzyl ammonium chloride 0.11%
n-Alkyl (68% C12, 32% C14) dimethyl ethylbenzyl ammonium chloride 0.11%
3-(trimethoxysilyl) propyldimethyloctadecyl ammonium chloride..... 0.11%

INERT INGREDIENTS 99.67%

KEEP OUT OF REACH OF CHILDREN
CAUTION: See additional precautionary statements on back label

Net Contents:

- 1 Reduces (controls) many household germs (on hard surfaces).
- 1 Reduces (controls) the growth of odor causing bacteria (on hard surfaces) (for up to 14 days).
- 3 BD1 cleans (and disinfects) most (kitchen) (bathroom) surfaces.
- 3 BD1 stops many bacteria (from coming back) (for up to 14 days).
- 5 BD1 stops many household germs.
- 6 Gives treated surfaces effective protection against (most household germs) (and many bacteria).
- 7 Disinfects and deodorizes
- 8 Kills most household germs (many bacteria (and [mold and] mildew)) (and athlete's foot fungus (or Trichophyton mentagrophytes)) (~~on hard surfaces~~) ~~→~~
- 8 Kills (eliminates) many household germs -- *Staphylococcus aureus* (Staph), *Streptococcus faecalis* (Strep), *Escherichia coli* (E. coli), *Salmonella choleraesuis* (Salmonella)
- 9 Eliminates (kills) the source of odors on treated surfaces (in the home) (in the bathroom) (in the kitchen) -- (most household germs) (many bacteria) (and mildew)
- Antibacterial
- Bacteriostatic
- Fungistatic (for up to 14 days) 7?
- Bactericidal
- Fungicidal ~~→~~
- Virucidal*
- Kills Herpes Simplex I
- Kills Herpes Simplex II
- Kills Herpes Simplex I and Herpes Simplex II
- Mildewstatic
- (Up to 14 day) Antibacterial activity ~~→~~
- Residual self-sanitizing for up to 14 days
- Inhibits many household germs (and most bacteria growth).
- Kills (eliminates) (smelly) mildew
- Helps eliminate (smelly) mildew that can grow in even the cleanest homes
- Controls mildew
- Kills many household germs (and many bacteria) in just one minute.
- Cleans, shines, and disinfects washable (bathroom) (and) (kitchen) surfaces and fixtures around the home
- Disinfects as it cleans

ACCEPTED
with COMMENTS
in EPA Letter Dated:
FEB 29 2000

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide. Registered under EPA Reg. No. 4822-484

Eliminates (kills) mold (and mildew) on hard surfaces (and prevents it (them) from re-growing for 14 days.)

Prevents mold (and mildew) from re-growing (returning) for (up to) 14 days.

Provides effective protection against mold (and) mildew and germs.

Effective on modern washable surfaces like fiberglass, glazed porcelain, Formica®*, stainless steel, synthetic marble, tile, plastic, and vinyl

For other surfaces, spot test in an inconspicuous area

Contains no abrasives, harsh acid or bleach

Won't scratch

(For use on) (Cleans):

- Tubs (and tile)
- Vanity tops
- Sinks
- Chrome
- Shower Curtains
- Kitchen (areas)
- Sinks
- Tub
- Stove(tops)
- Counter
- Appliances
- Toilet seats
- Cabinets
- Counter Tops
- Household
- Shower (stalls) (areas)
- Toilets
- Floors
- Refrigerators
- Hard surface
- Garbage cans
- Window sills
- Washable walls
- Kitchen Sills

Non-abrasive and contains no bleach

No harsh fumes

Bleach-free (formula)

No harsh chemical odor

For best results on cleaning tough soils, allow product to remain on surface longer

Save money by buying our refill size

45% More Free!

32 oz at the 22 oz price

Patented formulation

US Patent 5,411,585

*Formica® is a registered trademark of Formica Corp.

Important facts:

Recyclable packaging

(Contains) no phosphates

Phosphate free

Bottle is made of (at least) 25% post-consumer recycled plastic

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DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

TO CLEAN:

Spray 6-8" from surface to be cleaned. Allow (foam) (product) to penetrate (soiled area) (soap scum), (dirt), (and stains). Wipe with wet cloth or sponge. (No need to wipe dry). On chrome, rinse with water.

TO DISINFECT AND FOR (RESIDUAL) ANTIBACTERIAL CONTROL:

Spray surface until thoroughly wet. Leave for (at least) 1 minute before wiping.

For heavily soiled surfaces, first clean surface according to Clean Directions.

Reapply as surface becomes heavily soiled for (residual) antibacterial control.

TO CONTROL (MOLD AND) MILDEW (FOR RESIDUAL CONTROL OF MOLD AND MILDEW):

Spray surface until thoroughly wet, leave for (at least) 1 minute (before wiping). Reapply as new growth appears.

For residual control of mold and mildew, reapply at least every two weeks or as surface becomes heavily soiled.

(For best residual results, start using on surfaces that are free of visible mold and mildew (stains.))

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

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

FIRST AID:

If in eyes: Flush with plenty of water. If irritation persists, get medical attention.

If on skin: Wash promptly with plenty of soap and water. Get medical attention.

STORAGE & DISPOSAL:

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

DISPOSAL: Do not reuse empty container (except when using refill pack). To discard empty container wrap container and put in trash.

Questions? Comments? Call 800-558-5252 or write Helen Johnson

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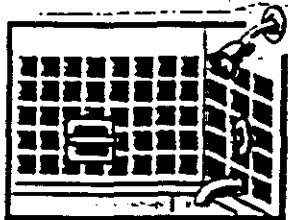
EPA Reg. No. 4822-484

EPA Est. No. 4822-WI-1

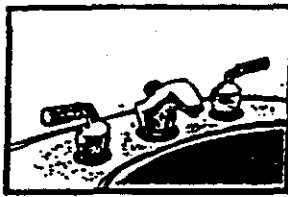
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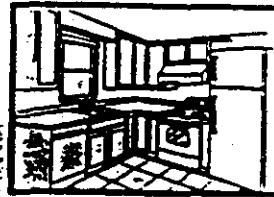
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TUB AND SHOWER AREAS



SINKS AND CHROME



KITCHEN AREAS

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